

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

ZBOX GLOBAL, LLC,	)	
	)	
Plaintiff,	)	Civil Action No.: 2:23-cv-11708
	)	
vs.	)	
	)	
TRACTOR PARTS AND	)	
ACCESSORIES, LLC,	)	<b>JURY TRIAL DEMANDED</b>
	)	
Defendant.	)	
	)	

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**COMPLAINT**

Plaintiff ZBox Global, LLC (“ZBox”), by its undersigned attorneys, alleges the following for its Complaint against Defendant Tractor Parts and Accessories, LLC. (“Tractor Parts”):

**Parties**

1. ZBox is a limited liability company organized and existing under the laws of the state of Michigan and having a place of business located at 2050 Harper Ave., Detroit, MI 48225.

2. On information and belief, Tractor Parts is limited liability company existing under the laws of the state of Michigan and having a place of business at 40600 Ann Arbor Rd. E. Suite 201, Plymouth, MI 48170.

**Jurisdiction and Venue**

3. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338, as well as 15 U.S.C. § 1121, because this action arises under the trademark laws of the United States (Title 15 Chapter 22 of the United States Code) and the copyright laws of the United States (Title 17 of the United States Code). This Court has supplemental jurisdiction over the state counts under 28 U.S.C. § 1337.

4. This Court has personal jurisdiction over Tractor Parts because Tractor Parts resides in the state of Michigan and has conducted and continues to conduct business in this judicial district and, upon information and belief, has engaged in activities related to ZBox's claims of federal copyright infringement and federal unfair competition that establish minimum contacts with the state of Michigan, including having committed acts copyright infringement and unfair competition in this judicial district, and the exercise of personal jurisdiction over Tractor Parts is reasonable and fair. Personal jurisdiction over Tractor Parts may be established under Fed. R. Civ. P. 4(k).

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1331 and 1338 because Tractor Parts resides in this district.

**Common Allegations**

6. ZBox is a leading supplier of aftermarket parts for the heavy machinery industry. In connection with its business, ZBox has taken well over 1000 original photographs of the aftermarket parts.

7. ZBox's original photographs are used to advertise, offer for sale and sell parts sold by ZBox.

8. ZBox uses the original copyrighted pictures of the aftermarket parts on, *inter alia*, its website at [www.ZBox.com](http://www.ZBox.com) to identify the parts.

9. ZBox also uses its original copyrighted pictures in its listings on eBay to advertise, offer for sale and sell ZBox's parts.

10. ZBox has expended considerable time, effort and money in creating its own original copyrighted photographs.

11. As author of the photographs, ZBox owns the copyrights for each and every one of its original photographs.

12. ZBox has registered dozens of its original photographs with the United States Copyright Office.

13. Tractor Parts also advertises, offers for sale and sells aftermarket parts on sales platforms such as eBay.

14. Without permission from ZBox, Tractor Parts copied over 1000 of ZBox's original copyrighted photographs.

15. Without permission from ZBox, Tractor Parts displayed copies of each of ZBox's original copyrighted photographs on at least eBay.

16. On information and belief, and in addition to displaying copies of each of ZBox's original copyrighted photographs, Tractor Parts "scraped" ZBox's eBay listings and used the scraped material to create Tractor Parts' listings for its own parts.

17. Tractor Parts' eBay listings contain ZBox's original copyrighted photographs and Tractor Parts' eBay listings are strikingly similar to ZBox's listings.

18. Tractor Parts' use of copies of ZBox's photographs leads customers to believe that ZBox's photographs are actually those of Tractor Parts.

19. Tractor Parts conduct in connection with copying and displaying each of ZBox's original photographs was in willful disregard for ZBox's intellectual property rights.

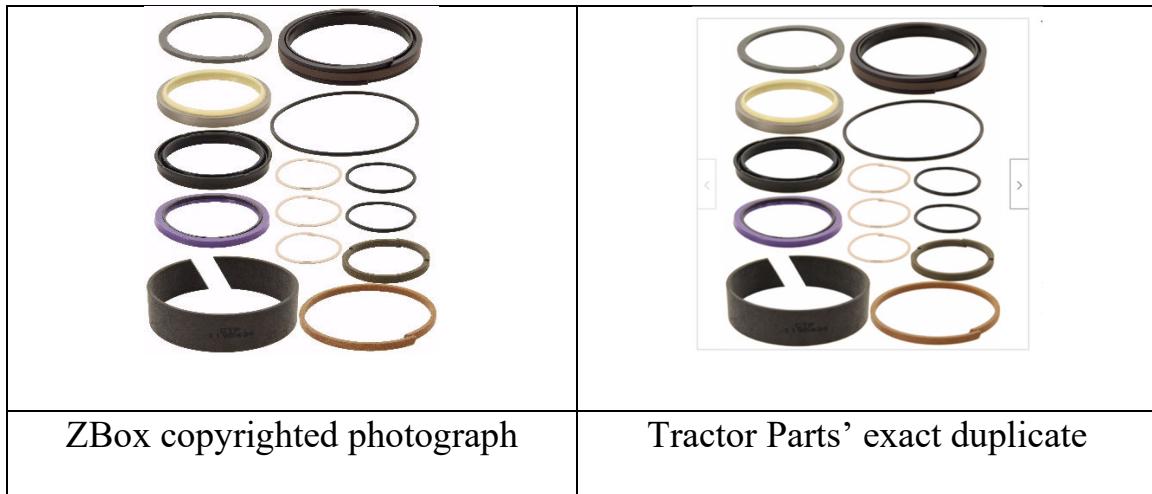
**Count 1 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-307-756)**

20. ZBox repeats and realleges the allegation contained in paragraphs 1 through 19 as if fully set forth herein.

21. ZBox registered its copyright for its original photograph for Seal Kit 1697896-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-756, "the '756 copyright registration"). A true and correct copy

of the '756 copyright registration, and the original photograph that is the subject of the '756 copyright registration are attached to this Complaint in Exhibit 1.

22. ZBox's original photograph covered by the '756 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



23. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '756 copyright registration, and therefore infringed the '756 copyright registration in violation of 17 U.S.C. §501.

24. Copies of ZBox's eBay listing showing its original photograph covered by '756 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 1.

25. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

26. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

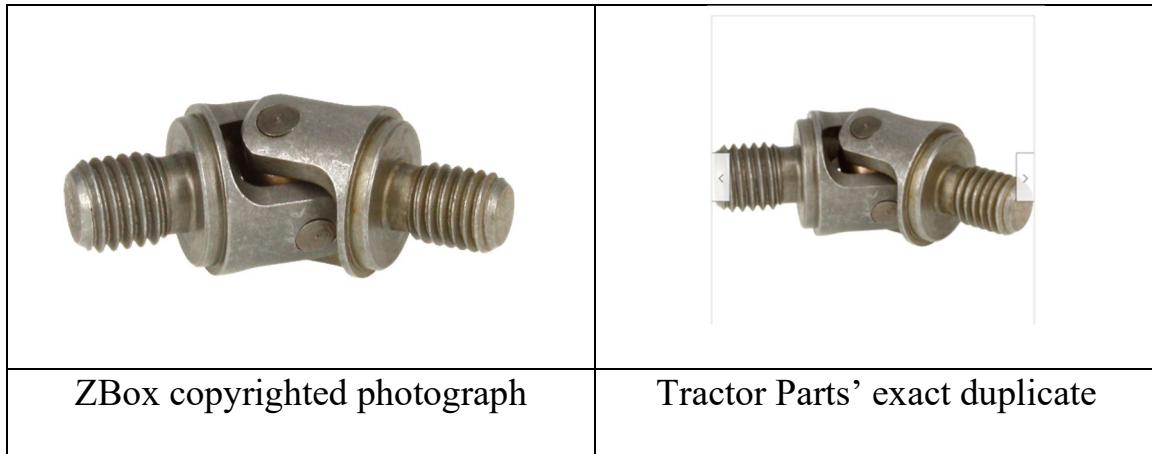
27. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 2 – Copyright Infringement**  
**Infringement of Copyright Registration No. VA 2-307-801)**

28. ZBox repeats and realleges the allegation contained in paragraphs 1 through 27 as if fully set forth herein.

29. ZBox registered its copyright for its original photograph for Joint Kit 2085472P1-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-801, "the '801 copyright registration"). A true and correct copy of the '801 copyright registration, and the original photograph that is the subject of the '801 copyright registration are attached to this Complaint in Exhibit 2.

30. ZBox's original photograph covered by the '801 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



31. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '801 copyright registration, and therefore infringed the '801 copyright registration in violation of 17 U.S.C. §501.

32. Copies of ZBox's eBay listing showing its original photograph covered by '801 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 2.

33. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

34. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

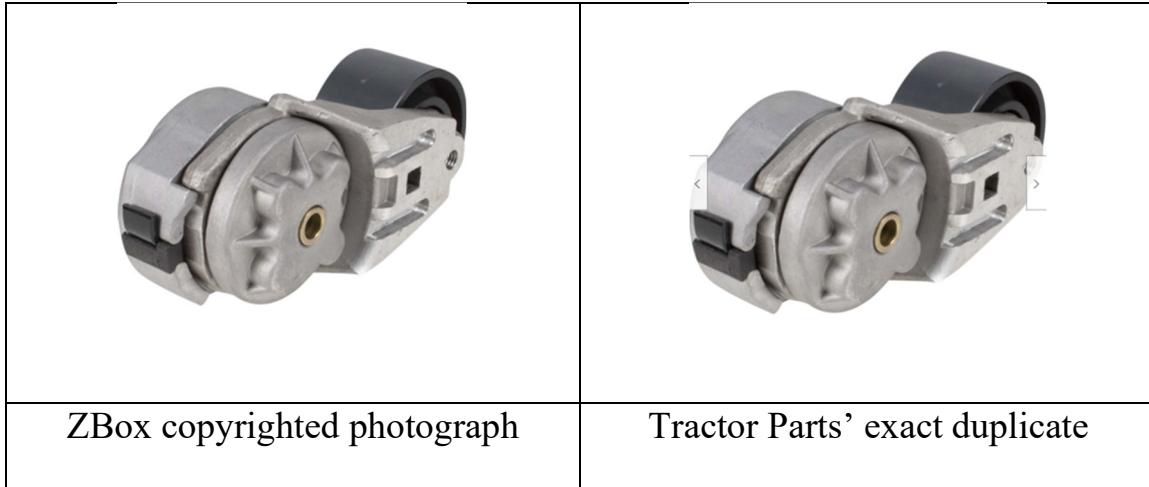
35. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 3 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-798)**

36. ZBox repeats and realleges the allegation contained in paragraphs 1 through 35 as if fully set forth herein.

37. ZBox registered its copyright for its original photograph for Belt Tensioner 87326910-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-798, “the ’798 copyright registration”). A true and correct copy of the ’798 copyright registration, and the original photograph that is the subject of the ’798 copyright registration are attached to this Complaint in Exhibit 3.

38. ZBox’s original photograph covered by the ’798 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



39. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '798 copyright registration, and therefore infringed the '798 copyright registration in violation of 17 U.S.C. §501.

40. Copies of ZBox's eBay listing showing its original photograph covered by '798 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 3.

41. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

42. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

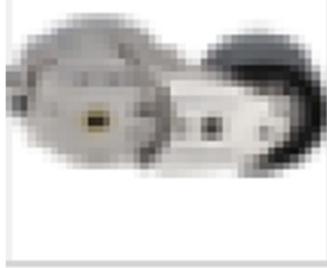
43. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 4 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-799)**

44. ZBox repeats and realleges the allegation contained in paragraphs 1 through 43 as if fully set forth herein.

45. ZBox registered its copyright for its original photograph for Belt Tensioner 87326910-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-799, “the ’799 copyright registration”). A true and correct copy of the ’799 copyright registration, and the original photograph that is the subject of the ’799 copyright registration are attached to this Complaint in Exhibit 4.

46. ZBox’s original photograph covered by the ’799 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

47. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '799 copyright registration, and therefore infringed the '799 copyright registration in violation of 17 U.S.C. §501.

48. Copies of ZBox's eBay listing showing its original photograph covered by '799 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 4.

49. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

50. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

51. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

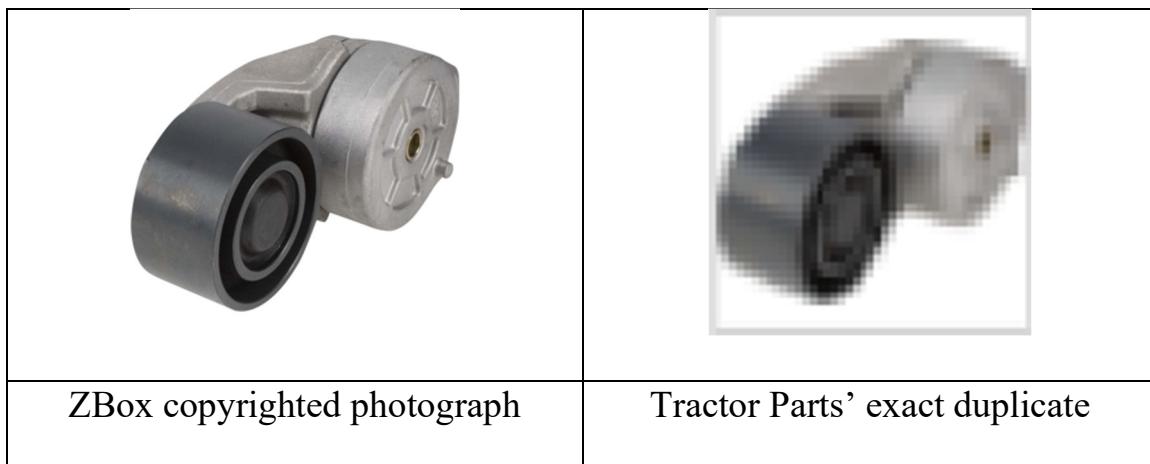
**Count 5 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-800)**

52. ZBox repeats and realleges the allegation contained in paragraphs 1 through 51 as if fully set forth herein.

53. ZBox registered its copyright for its original photograph for Belt Tensioner 87326910-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-800, "the '800 copyright registration"). A

true and correct copy of the '800 copyright registration, and the original photograph that is the subject of the '800 copyright registration are attached to this Complaint in Exhibit 5.

54. ZBox's original photograph covered by the '800 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



55. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '800 copyright registration, and therefore infringed the '800 copyright registration in violation of 17 U.S.C. §501.

56. Copies of ZBox's eBay listing showing its original photograph covered by '800 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 5.

57. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

58. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

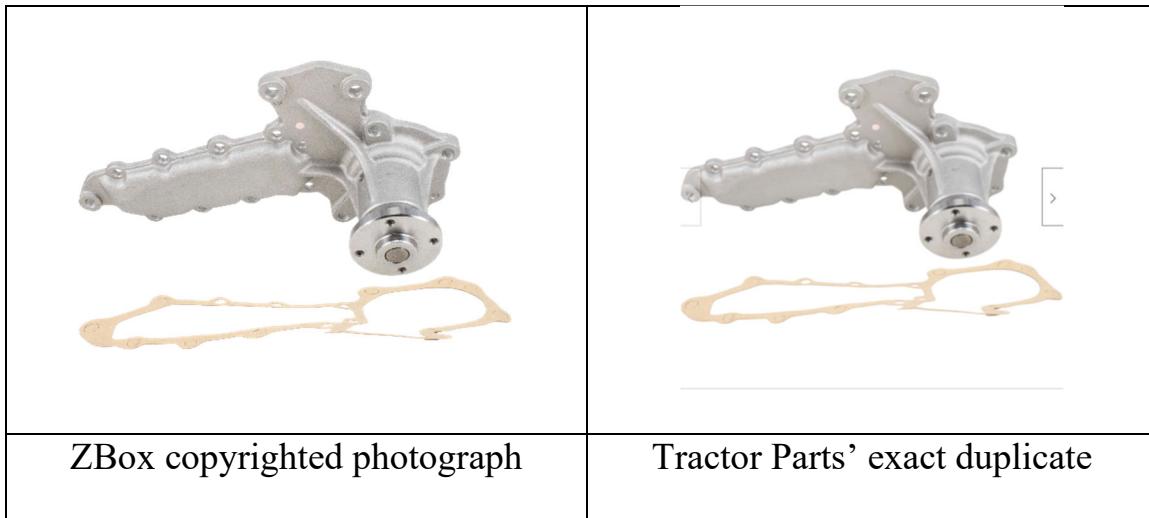
59. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 6 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-306-685)**

60. ZBox repeats and realleges the allegation contained in paragraphs 1 through 59 as if fully set forth herein.

61. ZBox registered its copyright for its original photograph for Water Pump 15521-73033-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-685, "the '685 copyright registration"). A true and correct copy of the '685 copyright registration, and the original photograph that is the subject of the '685 copyright registration are attached to this Complaint in Exhibit 6.

62. ZBox's original photograph covered by the '685 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



63. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '685 copyright registration, and therefore infringed the '685 copyright registration in violation of 17 U.S.C. §501.

64. Copies of ZBox's eBay listing showing its original photograph covered by '685 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 6.

65. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

66. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

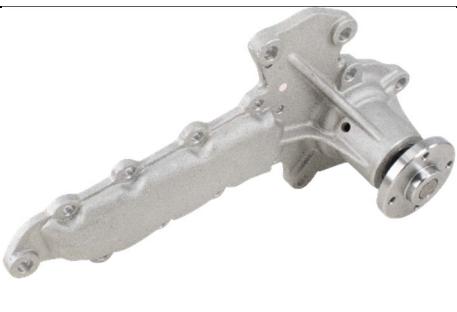
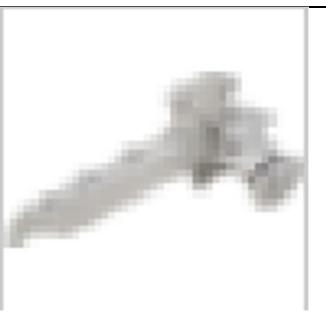
67. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 7 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-306-680)**

68. ZBox repeats and realleges the allegation contained in paragraphs 1 through 67 as if fully set forth herein.

69. ZBox registered its copyright for its original photograph for Water Pump 15521-73033-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-680, “the ’680 copyright registration”). A true and correct copy of the ’680 copyright registration, and the original photograph that is the subject of the ’680 copyright registration are attached to this Complaint in Exhibit 7.

70. ZBox’s original photograph covered by the ’680 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

71. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '680 copyright registration, and therefore infringed the '680 copyright registration in violation of 17 U.S.C. §501.

72. Copies of ZBox's eBay listing showing its original photograph covered by '680 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 7.

73. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

74. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

75. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

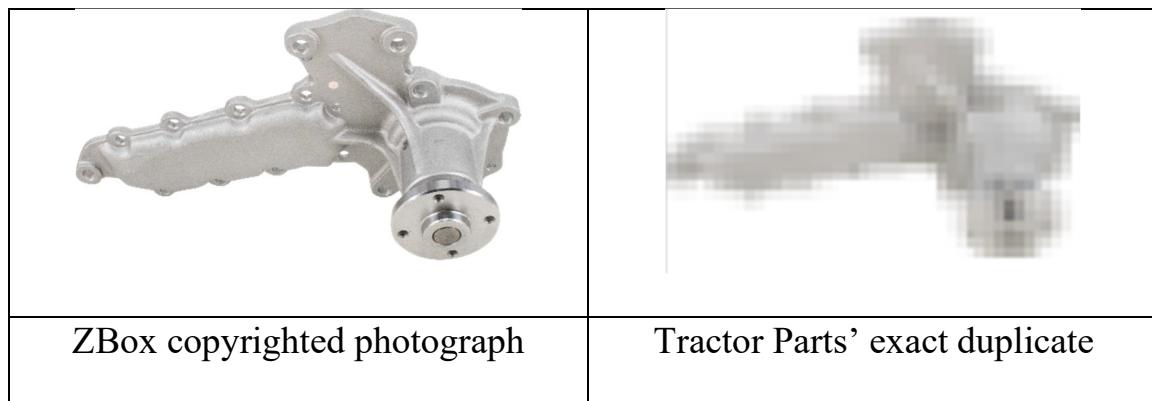
**Count 8 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-306-666)**

76. ZBox repeats and realleges the allegation contained in paragraphs 1 through 75 as if fully set forth herein.

77. ZBox registered its copyright for its original photograph for Water Pump 15521-73033-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-666, "the '666 copyright registration"). A

true and correct copy of the '666 copyright registration, and the original photograph that is the subject of the '666 copyright registration are attached to this Complaint in Exhibit 8.

78. ZBox's original photograph covered by the '666 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



79. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '666 copyright registration, and therefore infringed the '666 copyright registration in violation of 17 U.S.C. §501.

80. Copies of ZBox's eBay listing showing its original photograph covered by '666 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 8.

81. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

82. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

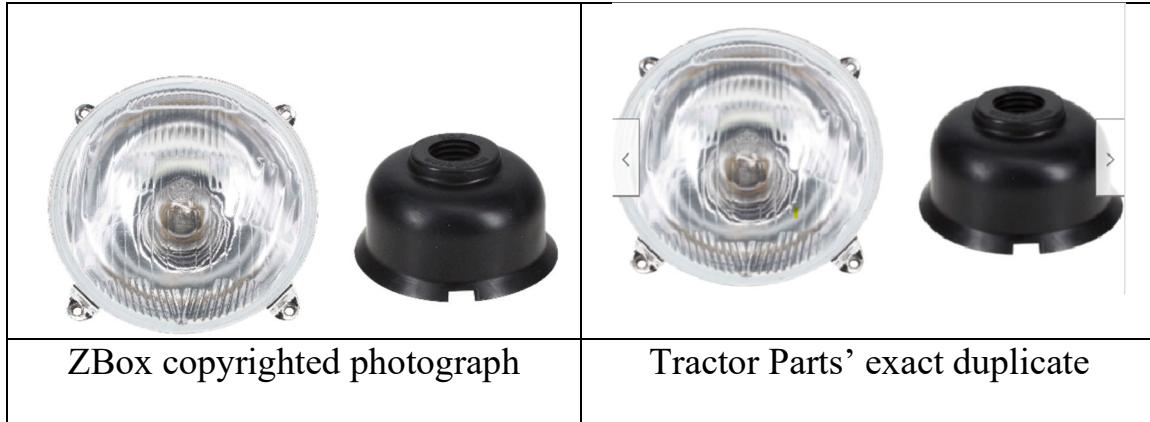
83. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 9 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-571)**

84. ZBox repeats and realleges the allegation contained in paragraphs 1 through 83 as if fully set forth herein.

85. ZBox registered its copyright for its original photograph for Light 1672768M91-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-571, "the '571 copyright registration"). A true and correct copy of the '571 copyright registration, and the original photograph that is the subject of the '571 copyright registration are attached to this Complaint in Exhibit 9.

86. ZBox's original photograph covered by the '571 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



87. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '571 copyright registration, and therefore infringed the '571 copyright registration in violation of 17 U.S.C. §501.

88. Copies of ZBox's eBay listing showing its original photograph covered by '571 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 9.

89. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

90. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

91. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 10 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-972)**

92. ZBox repeats and realleges the allegation contained in paragraphs 1 through 91 as if fully set forth herein.

93. ZBox registered its copyright for its original photograph for Light 1672768M91-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-972, “the ’972 copyright registration”). A true and correct copy of the ’972 copyright registration, and the original photograph that is the subject of the ’972 copyright registration are attached to this Complaint in Exhibit 10.

94. ZBox’s original photograph covered by the ’972 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

95. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '972 copyright registration, and therefore infringed the '972 copyright registration in violation of 17 U.S.C. §501.

96. Copies of ZBox's eBay listing showing its original photograph covered by '972 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 10.

97. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

98. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

99. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

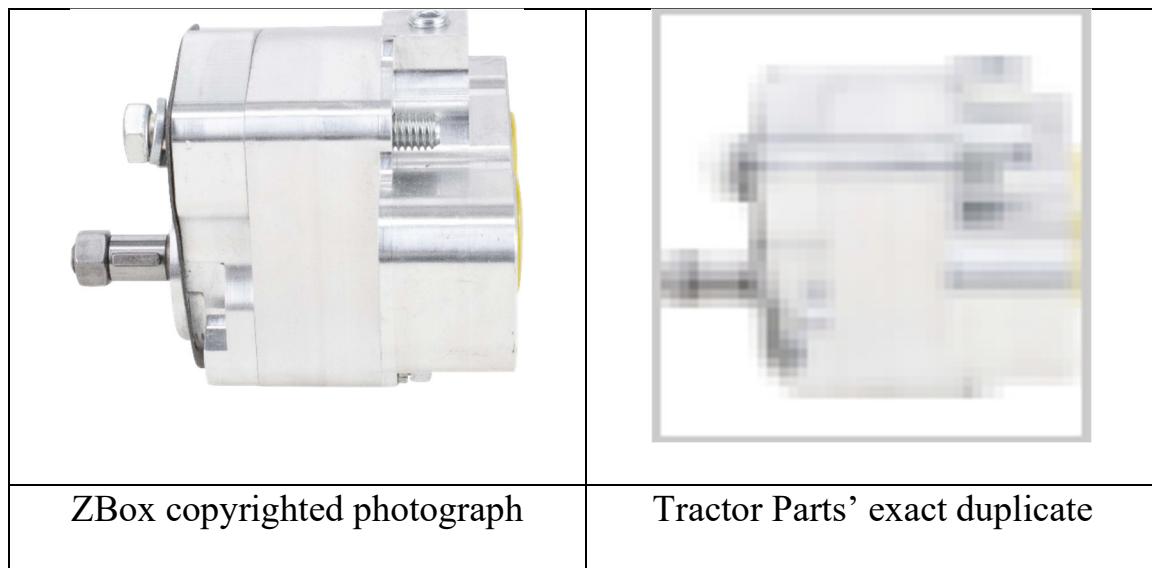
**Count 11 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-557)**

100. ZBox repeats and realleges the allegation contained in paragraphs 1 through 99 as if fully set forth herein.

101. ZBox registered its copyright for its original photograph for Hydraulic Pump 376993R94-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-557, "the '557 copyright registration"). A true and

correct copy of the '557 copyright registration, and the original photograph that is the subject of the '557 copyright registration are attached to this Complaint in Exhibit 11.

102. ZBox's original photograph covered by the '557 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



103. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '557 copyright registration, and therefore infringed the '557 copyright registration in violation of 17 U.S.C. §501.

104. Copies of ZBox's eBay listing showing its original photograph covered by '557 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 11.

105. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

106. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

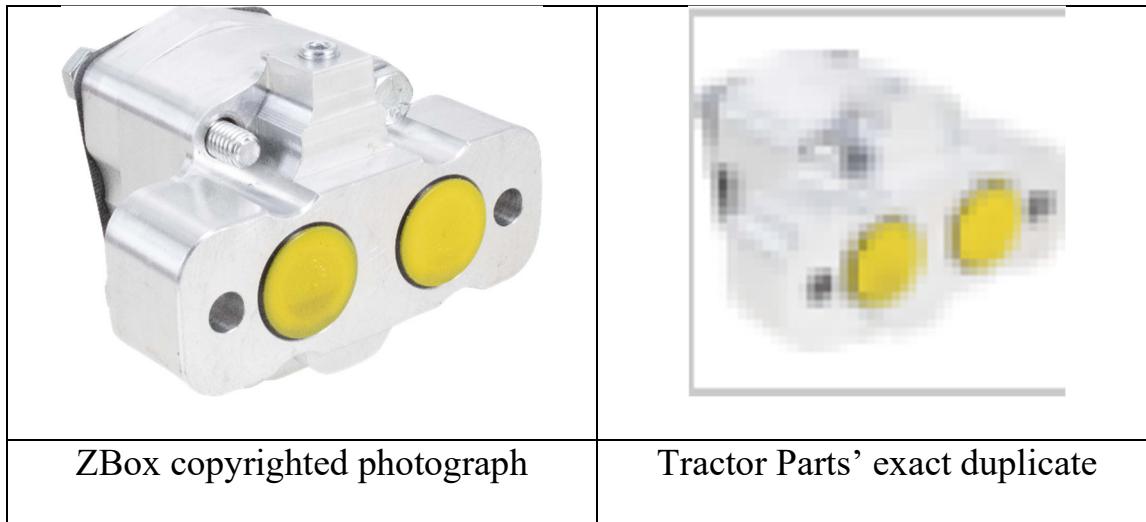
107. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 12 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-564)**

108. ZBox repeats and realleges the allegation contained in paragraphs 1 through 107 as if fully set forth herein.

109. ZBox registered its copyright for its original photograph for Hydraulic Pump 376993R94-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-564, "the '564 copyright registration"). A true and correct copy of the '564 copyright registration, and the original photograph that is the subject of the '564 copyright registration are attached to this Complaint in Exhibit 12.

110. ZBox's original photograph covered by the '564 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



111. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '564 copyright registration, and therefore infringed the '564 copyright registration in violation of 17 U.S.C. §501.

112. Copies of ZBox's eBay listing showing its original photograph covered by '564 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 12.

113. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

114. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

115. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 13 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-306-665)**

116. ZBox repeats and realleges the allegation contained in paragraphs 1 through 115 as if fully set forth herein.

117. ZBox registered its copyright for its original photograph for Shaft 528676R1-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-665, “the ’665 copyright registration”). A true and correct copy of the ’665 copyright registration, and the original photograph that is the subject of the ’665 copyright registration are attached to this Complaint in Exhibit 13.

118. ZBox’s original photograph covered by the ’665 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

119. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '665 copyright registration, and therefore infringed the '665 copyright registration in violation of 17 U.S.C. §501.

120. Copies of ZBox's eBay listing showing its original photograph covered by '665 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 13.

121. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

122. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

123. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

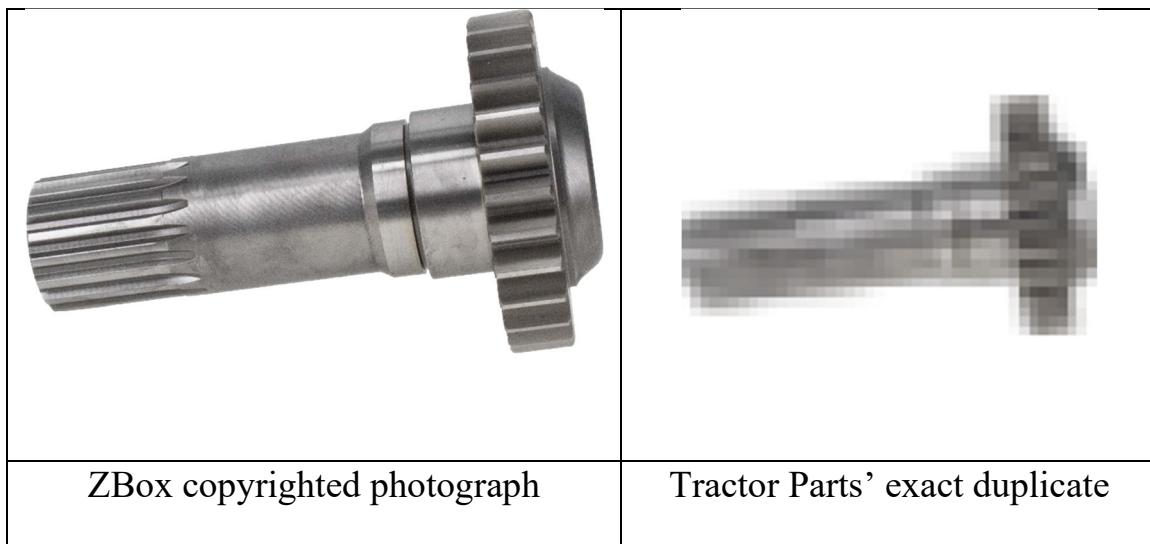
**Count 14 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-306-662)**

124. ZBox repeats and realleges the allegation contained in paragraphs 1 through 123 as if fully set forth herein.

125. ZBox registered its copyright for its original photograph for Shaft 528676R1-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-662, "the '662 copyright registration"). A true and

correct copy of the '662 copyright registration, and the original photograph that is the subject of the '662 copyright registration are attached to this Complaint in Exhibit 14.

126. ZBox's original photograph covered by the '662 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



127. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '662 copyright registration, and therefore infringed the '662 copyright registration in violation of 17 U.S.C. §501.

128. Copies of ZBox's eBay listing showing its original photograph covered by '662 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 14.

129. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

130. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

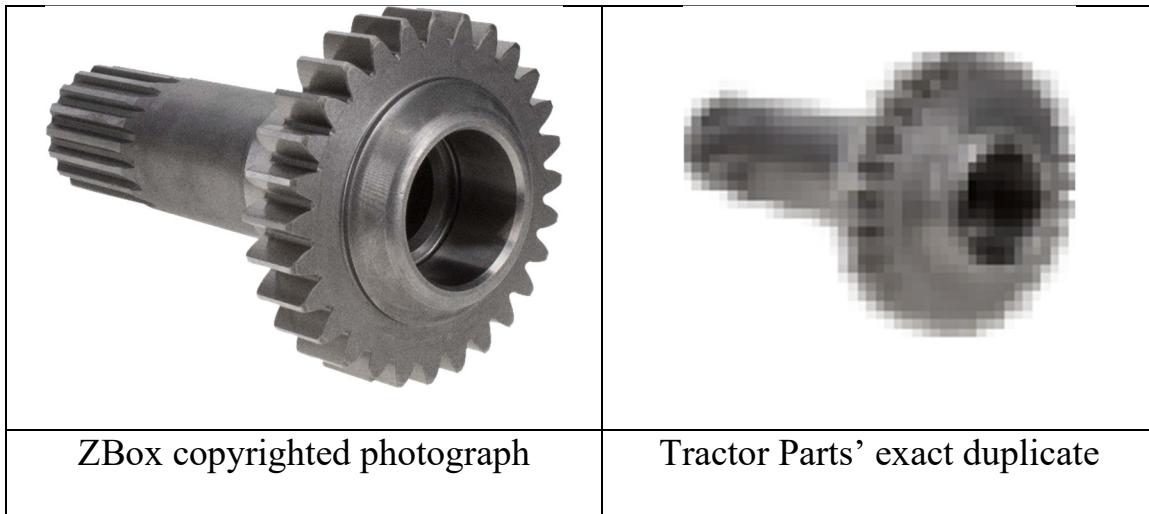
131. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 15 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-306-661)**

132. ZBox repeats and realleges the allegation contained in paragraphs 1 through 131 as if fully set forth herein.

133. ZBox registered its copyright for its original photograph for Shaft 528676R1-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-661, "the '661 copyright registration"). A true and correct copy of the '661 copyright registration, and the original photograph that is the subject of the '661 copyright registration are attached to this Complaint in Exhibit 15.

134. ZBox's original photograph covered by the '661 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



135. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '661 copyright registration, and therefore infringed the '661 copyright registration in violation of 17 U.S.C. §501.

136. Copies of ZBox's eBay listing showing its original photograph covered by '661 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 15.

137. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

138. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

139. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 16 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-574)**

140. ZBox repeats and realleges the allegation contained in paragraphs 1 through 139 as if fully set forth herein.

141. ZBox registered its copyright for its original photograph for Belt 5L660-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-574, “the ‘574 copyright registration”). A true and correct copy of the ‘574 copyright registration, and the original photograph that is the subject of the ‘574 copyright registration are attached to this Complaint in Exhibit 16.

142. ZBox’s original photograph covered by the ‘574 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

143. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '574 copyright registration, and therefore infringed the '574 copyright registration in violation of 17 U.S.C. §501.

144. Copies of ZBox's eBay listing showing its original photograph covered by '574 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 16.

145. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

146. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

147. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 17 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-306-644)**

148. ZBox repeats and realleges the allegation contained in paragraphs 1 through 147 as if fully set forth herein.

149. ZBox registered its copyright for its original photograph for Spindle 71785C1-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-644, "the '644 copyright registration"). A true and correct copy

of the '644 copyright registration, and the original photograph that is the subject of the '644 copyright registration are attached to this Complaint in Exhibit 17.

150. ZBox's original photograph covered by the '644 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



151. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '644 copyright registration, and therefore infringed the '644 copyright registration in violation of 17 U.S.C. §501.

152. Copies of ZBox's eBay listing showing its original photograph covered by '644 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 17.

153. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

154. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

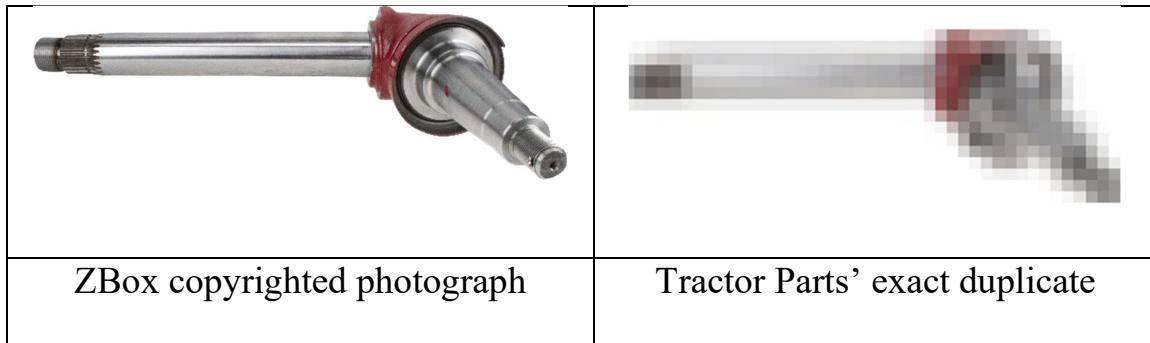
155. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 18 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-807)**

156. ZBox repeats and realleges the allegation contained in paragraphs 1 through 155 as if fully set forth herein.

157. ZBox registered its copyright for its original photograph for Spindle 71785C1-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-807, "the '807 copyright registration"). A true and correct copy of the '807 copyright registration, and the original photograph that is the subject of the '807 copyright registration are attached to this Complaint in Exhibit 18.

158. ZBox's original photograph covered by the '807 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



159. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '807 copyright registration, and therefore infringed the '807 copyright registration in violation of 17 U.S.C. §501.

160. Copies of ZBox's eBay listing showing its original photograph covered by '807 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 18.

161. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

162. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

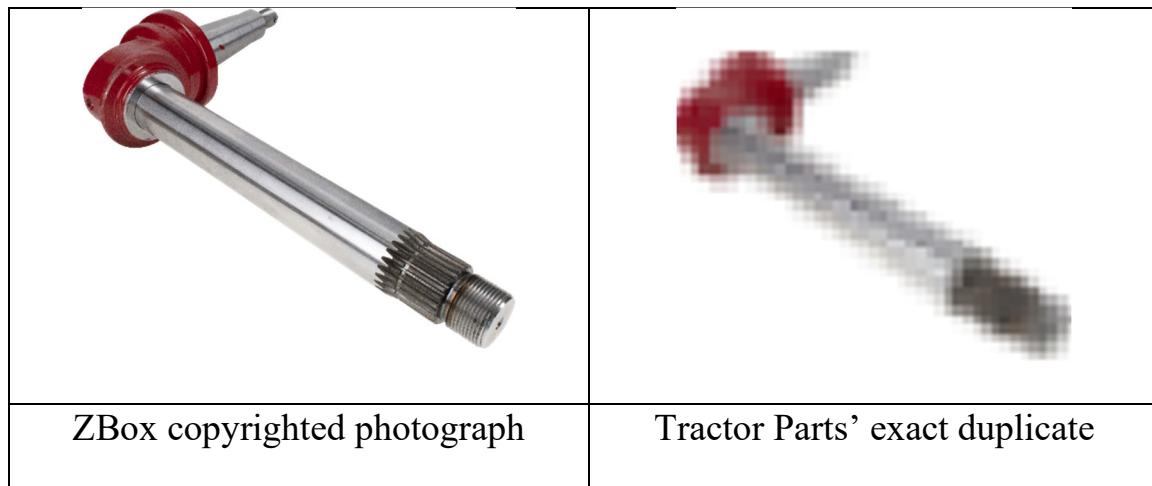
163. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 19 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-881)**

164. ZBox repeats and realleges the allegation contained in paragraphs 1 through 163 as if fully set forth herein.

165. ZBox registered its copyright for its original photograph for Spindle 71785C1-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-881, “the ‘881 copyright registration”). A true and correct copy of the ’881 copyright registration, and the original photograph that is the subject of the ’881 copyright registration are attached to this Complaint in Exhibit 19.

166. ZBox’s original photograph covered by the ’881 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



167. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '881 copyright registration, and therefore infringed the '881 copyright registration in violation of 17 U.S.C. §501.

168. Copies of ZBox's eBay listing showing its original photograph covered by '881 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 19.

169. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

170. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

171. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

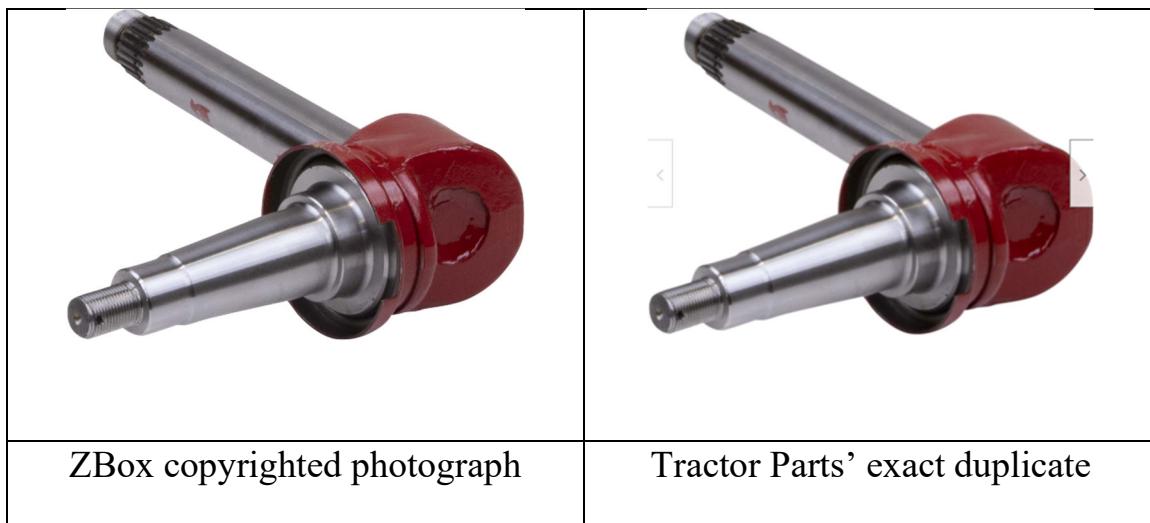
**Count 20 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-778)**

172. ZBox repeats and realleges the allegation contained in paragraphs 1 through 171 as if fully set forth herein.

173. ZBox registered its copyright for its original photograph for Spindle 71785HD-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-778, "the '778 copyright registration"). A true and

correct copy of the '778 copyright registration, and the original photograph that is the subject of the '778 copyright registration are attached to this Complaint in Exhibit 20.

174. ZBox's original photograph covered by the '778 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



175. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '778 copyright registration, and therefore infringed the '778 copyright registration in violation of 17 U.S.C. §501.

176. Copies of ZBox's eBay listing showing its original photograph covered by '778 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 20.

177. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

178. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

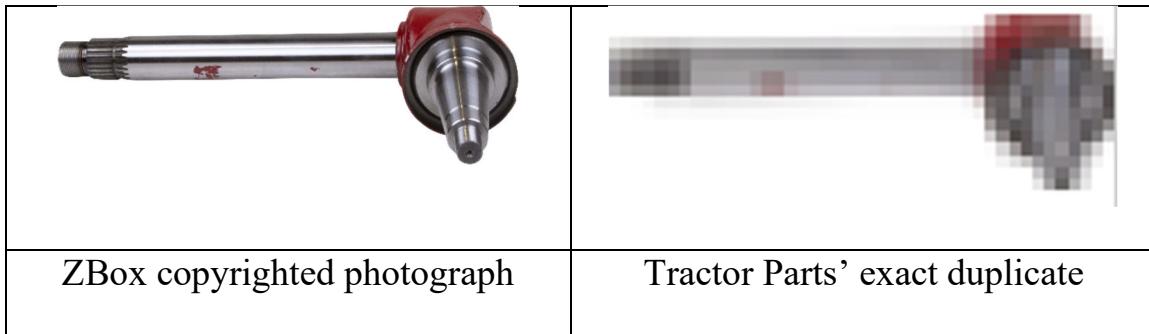
179. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 21 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-781)**

180. ZBox repeats and realleges the allegation contained in paragraphs 1 through 179 as if fully set forth herein.

181. ZBox registered its copyright for its original photograph for Spindle 71785HD-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-781, “the ‘781 copyright registration”). A true and correct copy of the ’781 copyright registration, and the original photograph that is the subject of the ’781 copyright registration are attached to this Complaint in Exhibit 21.

182. ZBox's original photograph covered by the ’781 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



183. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '781 copyright registration, and therefore infringed the '781 copyright registration in violation of 17 U.S.C. §501.

184. Copies of ZBox's eBay listing showing its original photograph covered by '781 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 21.

185. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

186. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

187. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 22 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-782)**

188. ZBox repeats and realleges the allegation contained in paragraphs 1 through 187 as if fully set forth herein.

189. ZBox registered its copyright for its original photograph for Spindle 71785HD-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-782, “the ‘782 copyright registration”). A true and correct copy of the ‘782 copyright registration, and the original photograph that is the subject of the ‘782 copyright registration are attached to this Complaint in Exhibit 22.

190. ZBox’s original photograph covered by the ‘782 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

191. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '782 copyright registration, and therefore infringed the '782 copyright registration in violation of 17 U.S.C. §501.

192. Copies of ZBox's eBay listing showing its original photograph covered by '782 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 22.

193. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

194. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

195. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

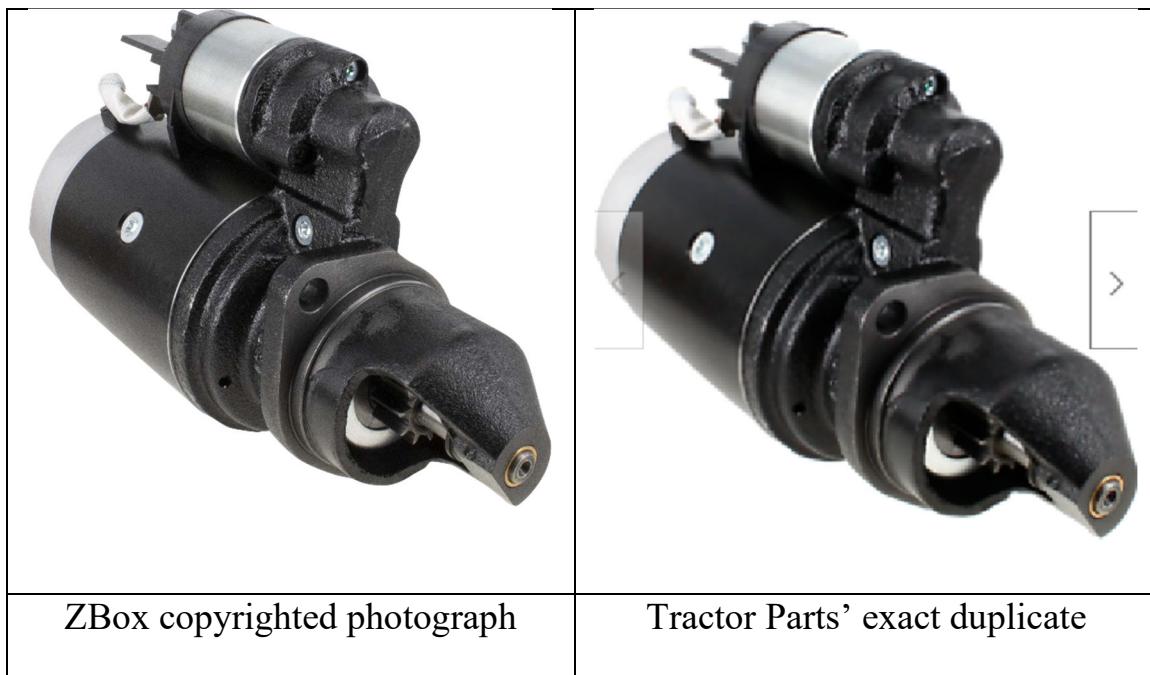
**Count 23 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-989)**

196. ZBox repeats and realleges the allegation contained in paragraphs 1 through 195 as if fully set forth herein.

197. ZBox registered its copyright for its original photograph for Starter AL110597-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-989, "the '989 copyright registration"). A true and

correct copy of the '989 copyright registration, and the original photograph that is the subject of the '989 copyright registration are attached to this Complaint in Exhibit 23.

198. ZBox's original photograph covered by the '989 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



199. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '989 copyright registration, and therefore infringed the '989 copyright registration in violation of 17 U.S.C. §501.

200. Copies of ZBox's eBay listing showing its original photograph covered by '989 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 23.

201. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

202. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

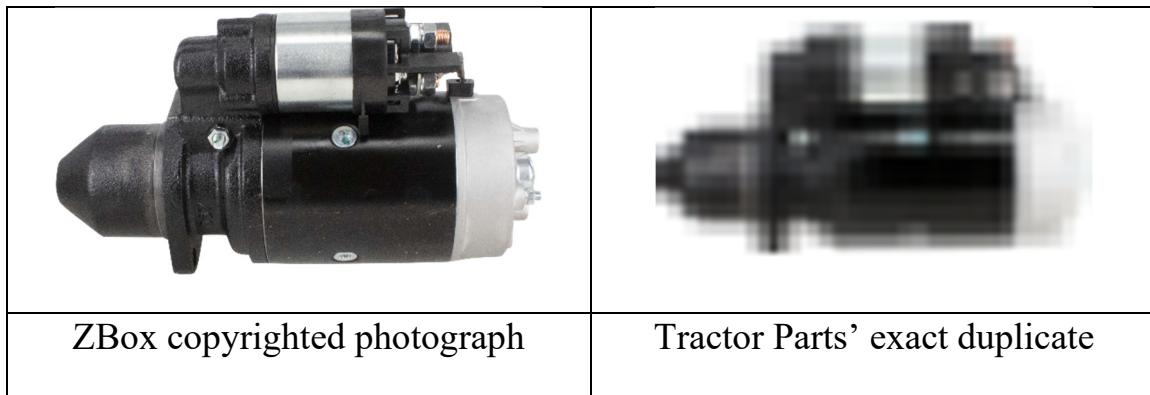
203. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 24 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-992)**

204. ZBox repeats and realleges the allegation contained in paragraphs 1 through 203 as if fully set forth herein.

205. ZBox registered its copyright for its original photograph for Starter AL110597-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-992, "the '992 copyright registration"). A true and correct copy of the '992 copyright registration, and the original photograph that is the subject of the '992 copyright registration are attached to this Complaint in Exhibit 24.

206. ZBox's original photograph covered by the '992 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



207. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '992 copyright registration, and therefore infringed the '992 copyright registration in violation of 17 U.S.C. §501.

208. Copies of ZBox's eBay listing showing its original photograph covered by '992 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 24.

209. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

210. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

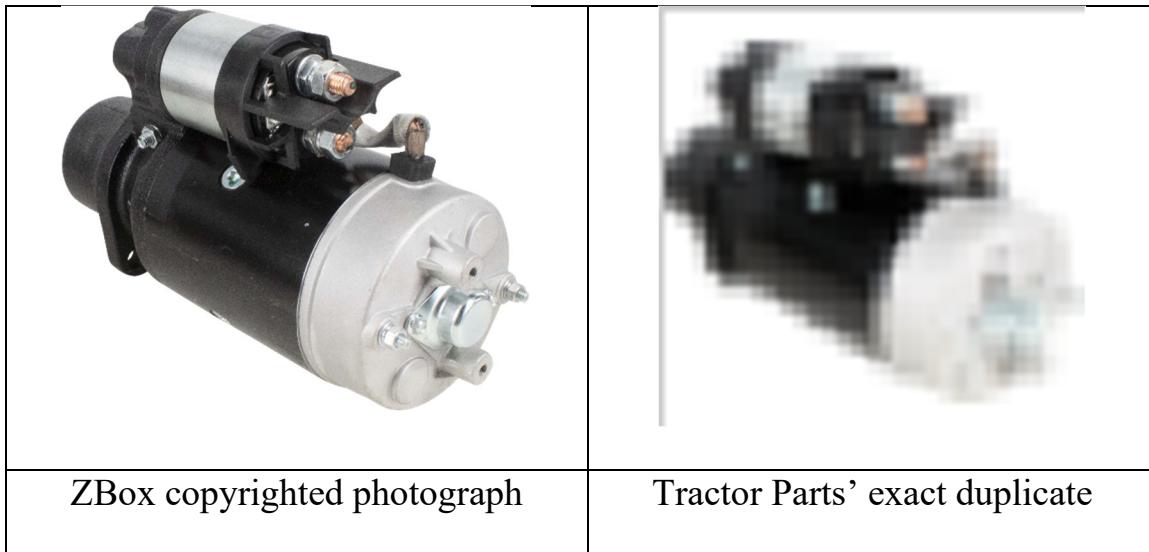
211. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 25 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-978)**

212. ZBox repeats and realleges the allegation contained in paragraphs 1 through 211 as if fully set forth herein.

213. ZBox registered its copyright for its original photograph for Starter AL110597-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-978, “the ‘978 copyright registration”). A true and correct copy of the ‘978 copyright registration, and the original photograph that is the subject of the ‘978 copyright registration are attached to this Complaint in Exhibit 25.

214. ZBox’s original photograph covered by the ‘978 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



215. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '978 copyright registration, and therefore infringed the '978 copyright registration in violation of 17 U.S.C. §501.

216. Copies of ZBox's eBay listing showing its original photograph covered by '978 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 25.

217. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

218. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

219. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 26 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-307-748)**

220. ZBox repeats and realleges the allegation contained in paragraphs 1 through 219 as if fully set forth herein.

221. ZBox registered its copyright for its original photograph for Compressor AL155836-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-748, “the ‘748 copyright registration”). A true and correct copy of the ‘748 copyright registration, and the original photograph that is the subject of the ‘748 copyright registration are attached to this Complaint in Exhibit 26.

222. ZBox’s original photograph covered by the ‘748 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

223. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '748 copyright registration, and therefore infringed the '748 copyright registration in violation of 17 U.S.C. §501.

224. Copies of ZBox's eBay listing showing its original photograph covered by '748 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 26.

225. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

226. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

227. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

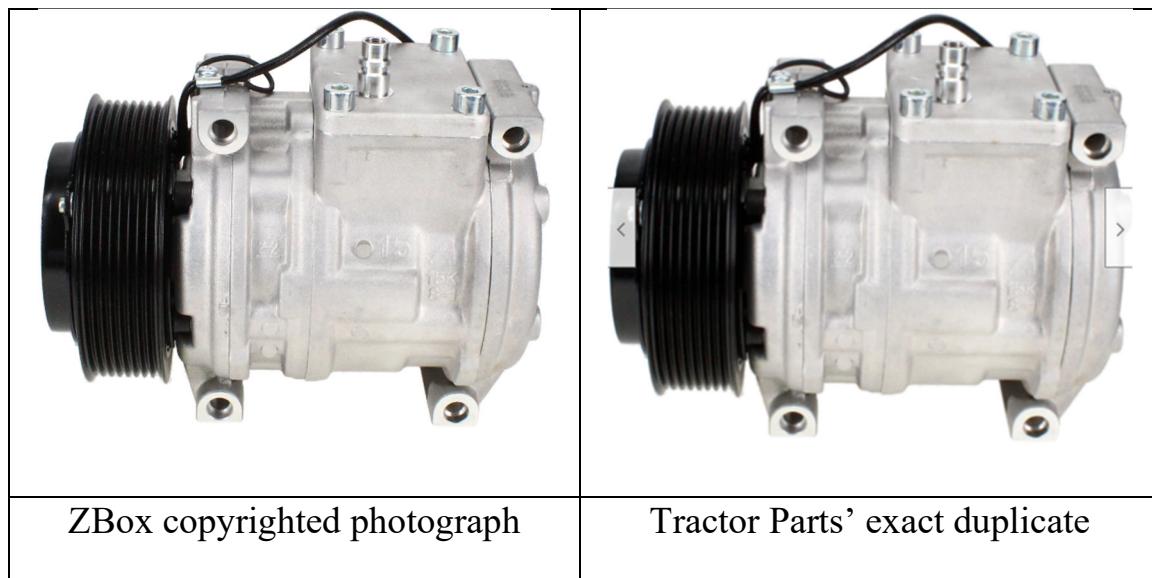
**Count 27 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-752)**

228. ZBox repeats and realleges the allegation contained in paragraphs 1 through 227 as if fully set forth herein.

229. ZBox registered its copyright for its original photograph for Compressor AL155836-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-752, "the '752 copyright registration"). A

true and correct copy of the '752 copyright registration, and the original photograph that is the subject of the '752 copyright registration are attached to this Complaint in Exhibit 27.

230. ZBox's original photograph covered by the '752 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



231. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '752 copyright registration, and therefore infringed the '752 copyright registration in violation of 17 U.S.C. §501.

232. Copies of ZBox's eBay listing showing its original photograph covered by '752 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 27.

233. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

234. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

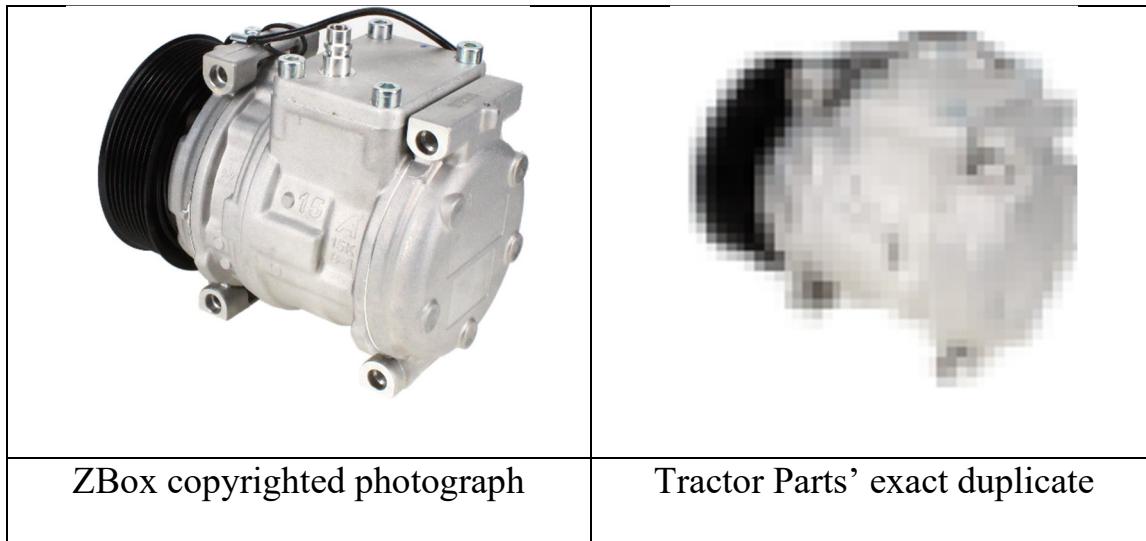
235. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 28 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-570)**

236. ZBox repeats and realleges the allegation contained in paragraphs 1 through 235 as if fully set forth herein.

237. ZBox registered its copyright for its original photograph for Compressor AL155836-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-570, “the ‘570 copyright registration”). A true and correct copy of the ‘570 copyright registration, and the original photograph that is the subject of the ‘570 copyright registration are attached to this Complaint in Exhibit 28.

238. ZBox's original photograph covered by the ‘570 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



239. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '570 copyright registration, and therefore infringed the '570 copyright registration in violation of 17 U.S.C. §501.

240. Copies of ZBox's eBay listing showing its original photograph covered by '570 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 28.

241. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

242. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

243. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 29 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-569)**

244. ZBox repeats and realleges the allegation contained in paragraphs 1 through 243 as if fully set forth herein.

245. ZBox registered its copyright for its original photograph for Compressor Weather Strip AL164267-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-569, “the ‘569 copyright registration”). A true and correct copy of the ‘569 copyright registration, and the original photograph that is the subject of the ‘569 copyright registration are attached to this Complaint in Exhibit 29.

246. ZBox’s original photograph covered by the ‘569 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



247. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '569 copyright registration, and therefore infringed the '569 copyright registration in violation of 17 U.S.C. §501.

248. Copies of ZBox's eBay listing showing its original photograph covered by '569 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 29.

249. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

250. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

251. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

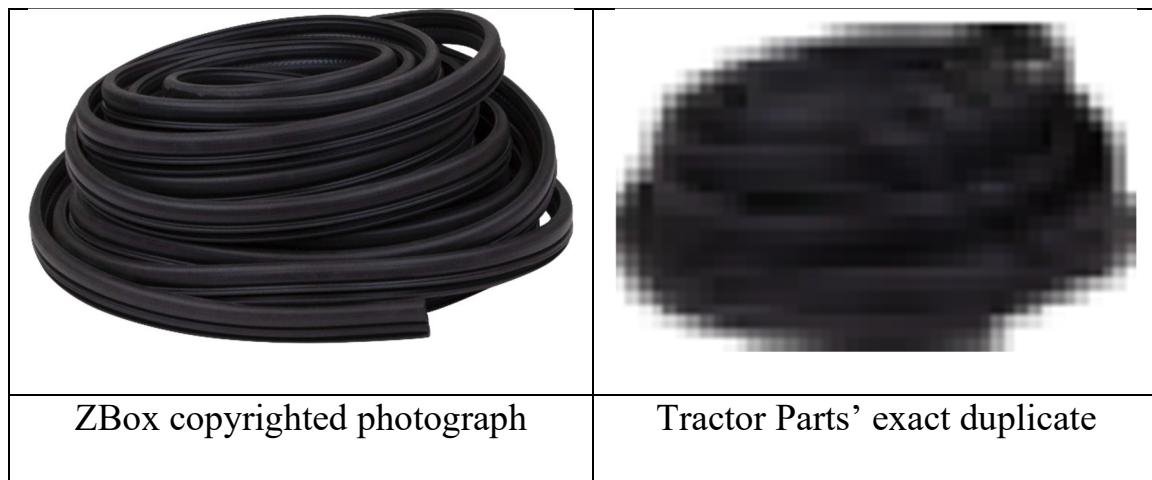
**Count 30 – Copyright Infringement  
Infringement of Copyright Registration No. VA 2-307-812)**

252. ZBox repeats and realleges the allegation contained in paragraphs 1 through 243 as if fully set forth herein.

253. ZBox registered its copyright for its original photograph for Compressor Weather Strip AL164267-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such

copyright being assigned Registration Number VA 2-307-812, “the ‘812 copyright registration”). A true and correct copy of the ’812 copyright registration, and the original photograph that is the subject of the ’812 copyright registration are attached to this Complaint in Exhibit 30.

254. ZBox’s original photograph covered by the ’812 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



255. Without permission from ZBox, Tractor Parts copied and displayed ZBox’s photograph covered by ’812 copyright registration, and therefore infringed the ’812 copyright registration in violation of 17 U.S.C. §501.

256. Copies of ZBox’s eBay listing showing its original photograph covered by ’812 copyright registration and Tractor Parts’ eBay listing exactly duplicating ZBox’s copyrighted photograph are also shown in Exhibit 30.

257. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

258. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

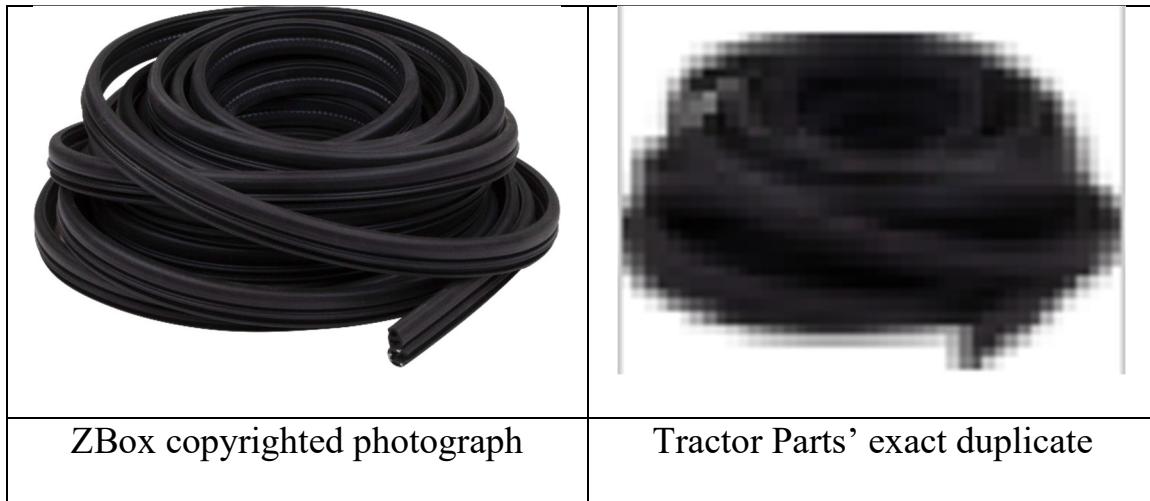
259. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 31 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-567)**

260. ZBox repeats and realleges the allegation contained in paragraphs 1 through 259 as if fully set forth herein.

261. ZBox registered its copyright for its original photograph for Weather Strip AL164267-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-567, “the ‘567 copyright registration”). A true and correct copy of the ’567 copyright registration, and the original photograph that is the subject of the ’567 copyright registration are attached to this Complaint in Exhibit 31.

262. ZBox's original photograph covered by the ’567 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



263. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '567 copyright registration, and therefore infringed the '567 copyright registration in violation of 17 U.S.C. §501.

264. Copies of ZBox's eBay listing showing its original photograph covered by '567 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 31.

265. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

266. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

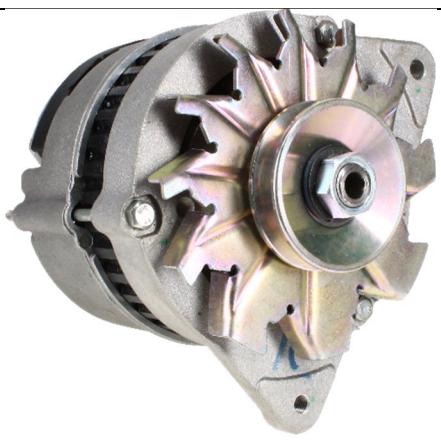
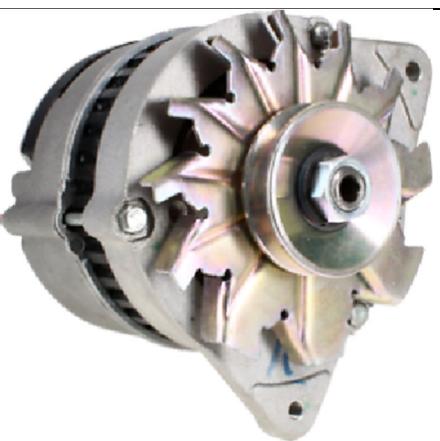
267. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 32 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-307-787)**

268. ZBox repeats and realleges the allegation contained in paragraphs 1 through 267 as if fully set forth herein.

269. ZBox registered its copyright for its original photograph for Alternator ALU0024-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-787, “the ‘787 copyright registration”). A true and correct copy of the ‘787 copyright registration, and the original photograph that is the subject of the ‘787 copyright registration are attached to this Complaint in Exhibit 32.

270. ZBox’s original photograph covered by the ‘787 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

271. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '787 copyright registration, and therefore infringed the '787 copyright registration in violation of 17 U.S.C. §501.

272. Copies of ZBox's eBay listing showing its original photograph covered by '787 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 32.

273. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

274. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

275. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

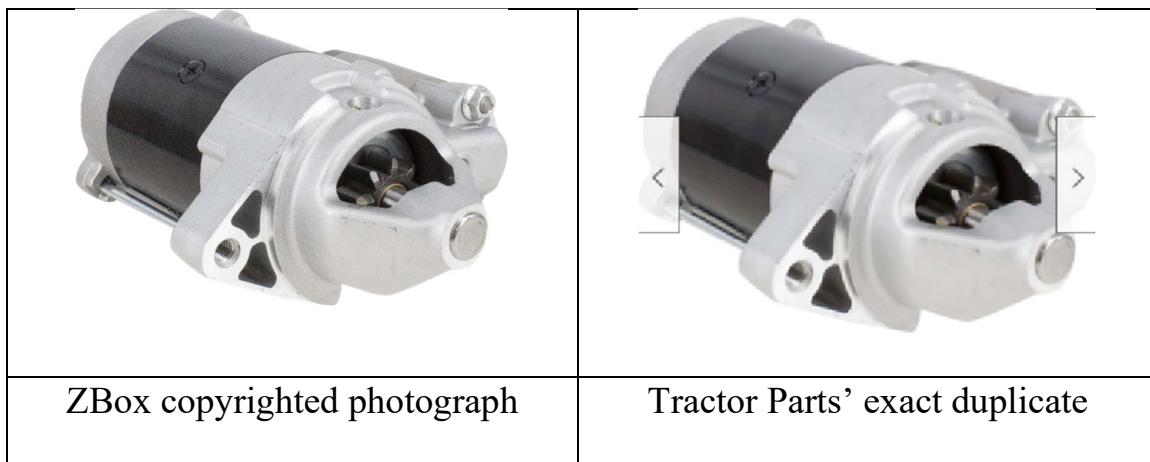
**Count 33 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-593)**

276. ZBox repeats and realleges the allegation contained in paragraphs 1 through 275 as if fully set forth herein.

277. ZBox registered its copyright for its original photograph for Starter AM108615-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-593, "the '593 copyright registration"). A true and

correct copy of the '593 copyright registration, and the original photograph that is the subject of the '593 copyright registration are attached to this Complaint in Exhibit 33.

278. ZBox's original photograph covered by the '593 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



279. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '593 copyright registration, and therefore infringed the '593 copyright registration in violation of 17 U.S.C. §501.

280. Copies of ZBox's eBay listing showing its original photograph covered by '593 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 33.

281. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

282. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

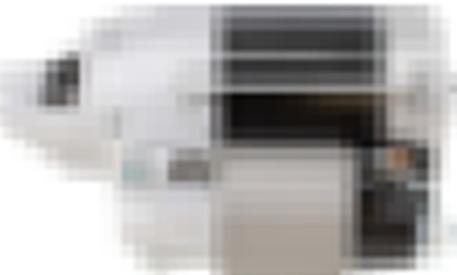
283. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 34 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-762)**

284. ZBox repeats and realleges the allegation contained in paragraphs 1 through 283 as if fully set forth herein.

285. ZBox registered its copyright for its original photograph for Starter AM108615-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-762, "the '762 copyright registration"). A true and correct copy of the '762 copyright registration, and the original photograph that is the subject of the '762 copyright registration are attached to this Complaint in Exhibit 34.

286. ZBox's original photograph covered by the '762 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts' exact duplicate

287. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '762 copyright registration, and therefore infringed the '762 copyright registration in violation of 17 U.S.C. §501.

288. Copies of ZBox's eBay listing showing its original photograph covered by '593 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 34.

289. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

290. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

291. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 35 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-765)**

292. ZBox repeats and realleges the allegation contained in paragraphs 1 through 291 as if fully set forth herein.

293. ZBox registered its copyright for its original photograph for Starter AM108615-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-765, “the ‘765 copyright registration”). A true and correct copy of the ‘765 copyright registration, and the original photograph that is the subject of the ‘765 copyright registration are attached to this Complaint in Exhibit 35.

294. ZBox’s original photograph covered by the ‘765 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

295. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '765 copyright registration, and therefore infringed the '765 copyright registration in violation of 17 U.S.C. §501.

296. Copies of ZBox's eBay listing showing its original photograph covered by '765 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 35.

297. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

298. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

299. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

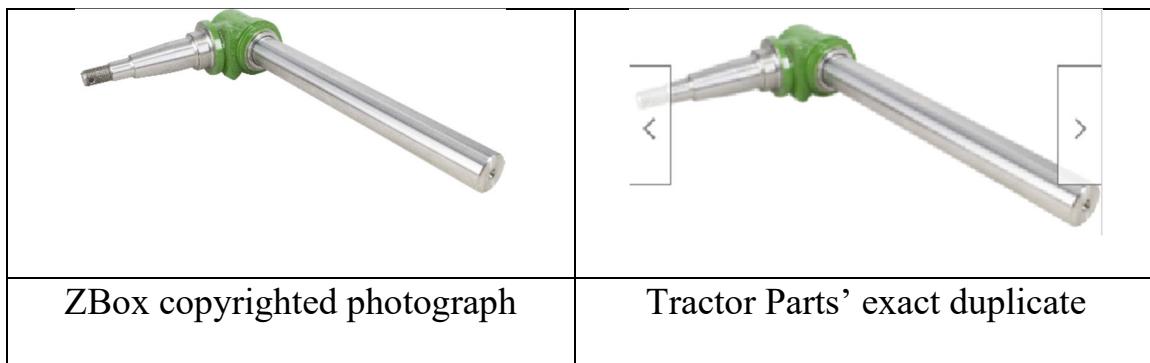
**Count 36 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-609)**

300. ZBox repeats and realleges the allegation contained in paragraphs 1 through 299 as if fully set forth herein.

301. ZBox registered its copyright for its original photograph for Spindle AR103472-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-609, "the '609 copyright registration"). A true and

correct copy of the '609 copyright registration, and the original photograph that is the subject of the '609 copyright registration are attached to this Complaint in Exhibit 36.

302. ZBox's original photograph covered by the '609 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



303. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '609 copyright registration, and therefore infringed the '609 copyright registration in violation of 17 U.S.C. §501.

304. Copies of ZBox's eBay listing showing its original photograph covered by '609 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 36.

305. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

306. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

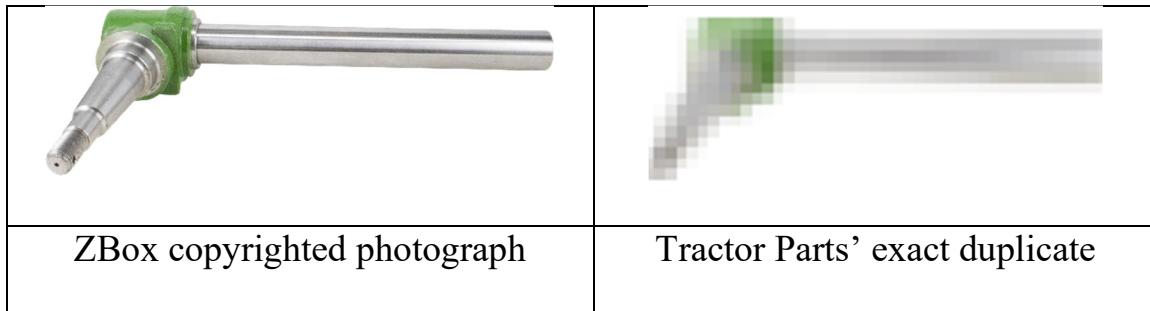
307. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 37 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-606)**

308. ZBox repeats and realleges the allegation contained in paragraphs 1 through 307 as if fully set forth herein.

309. ZBox registered its copyright for its original photograph for Spindle AR103472-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-606, "the '606 copyright registration"). A true and correct copy of the '606 copyright registration, and the original photograph that is the subject of the '606 copyright registration are attached to this Complaint in Exhibit 37.

310. ZBox's original photograph covered by the '606 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



311. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '606 copyright registration, and therefore infringed the '606 copyright registration in violation of 17 U.S.C. §501.

312. Copies of ZBox's eBay listing showing its original photograph covered by '606 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 37.

313. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

314. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

315. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 38 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-608)**

316. ZBox repeats and realleges the allegation contained in paragraphs 1 through 315 as if fully set forth herein.

317. ZBox registered its copyright for its original photograph for Spindle AR103472-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-608, “the ‘608 copyright registration”). A true and correct copy of the ‘608 copyright registration, and the original photograph that is the subject of the ‘608 copyright registration are attached to this Complaint in Exhibit 38.

318. ZBox’s original photograph covered by the ‘608 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

319. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '608 copyright registration, and therefore infringed the '608 copyright registration in violation of 17 U.S.C. §501.

320. Copies of ZBox's eBay listing showing its original photograph covered by '608 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 38.

321. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

322. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

323. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

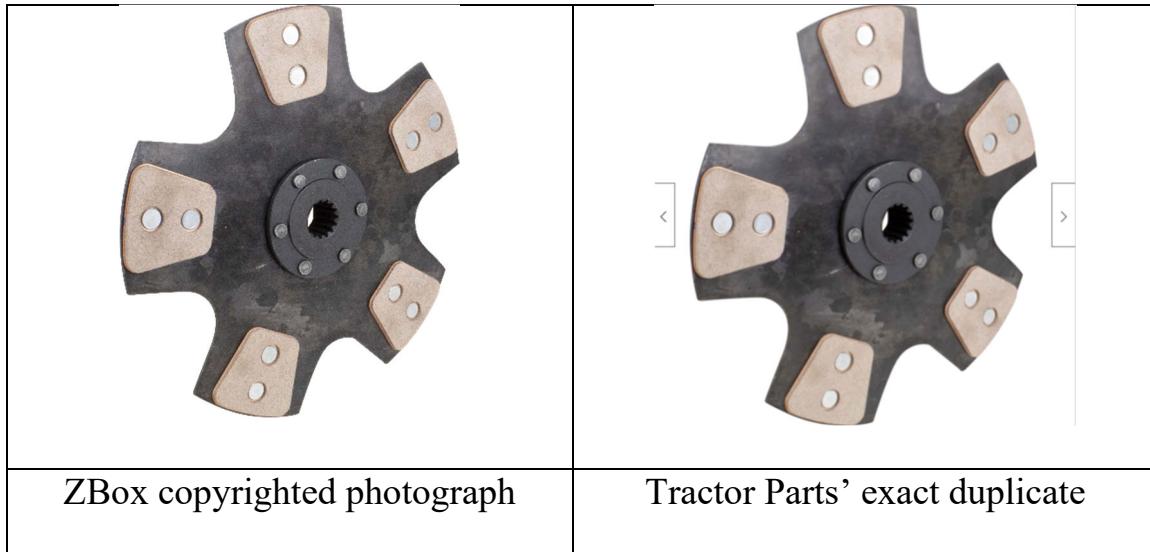
**Count 39 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-716)**

324. ZBox repeats and realleges the allegation contained in paragraphs 1 through 323 as if fully set forth herein.

325. ZBox registered its copyright for its original photograph for Disc AR63695-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-716, "the '716 copyright registration"). A true and

correct copy of the '716 copyright registration, and the original photograph that is the subject of the '716 copyright registration are attached to this Complaint in Exhibit 39.

326. ZBox's original photograph covered by the '716 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



327. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '716 copyright registration, and therefore infringed the '716 copyright registration in violation of 17 U.S.C. §501.

328. Copies of ZBox's eBay listing showing its original photograph covered by '716 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 39.

329. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

330. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

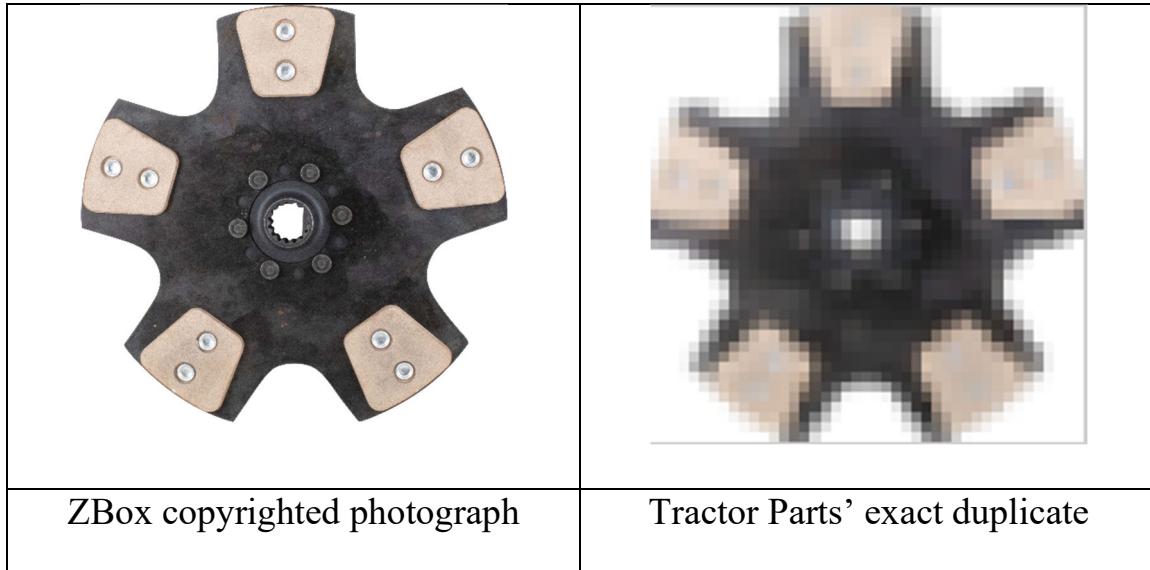
331. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 40 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-707)**

332. ZBox repeats and realleges the allegation contained in paragraphs 1 through 331 as if fully set forth herein.

333. ZBox registered its copyright for its original photograph for Disc AR63695-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-707, "the '707 copyright registration"). A true and correct copy of the '707 copyright registration, and the original photograph that is the subject of the '707 copyright registration are attached to this Complaint in Exhibit 40.

334. ZBox's original photograph covered by the '707 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



335. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '707 copyright registration, and therefore infringed the '707 copyright registration in violation of 17 U.S.C. §501.

336. Copies of ZBox's eBay listing showing its original photograph covered by '707 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 40.

337. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

338. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

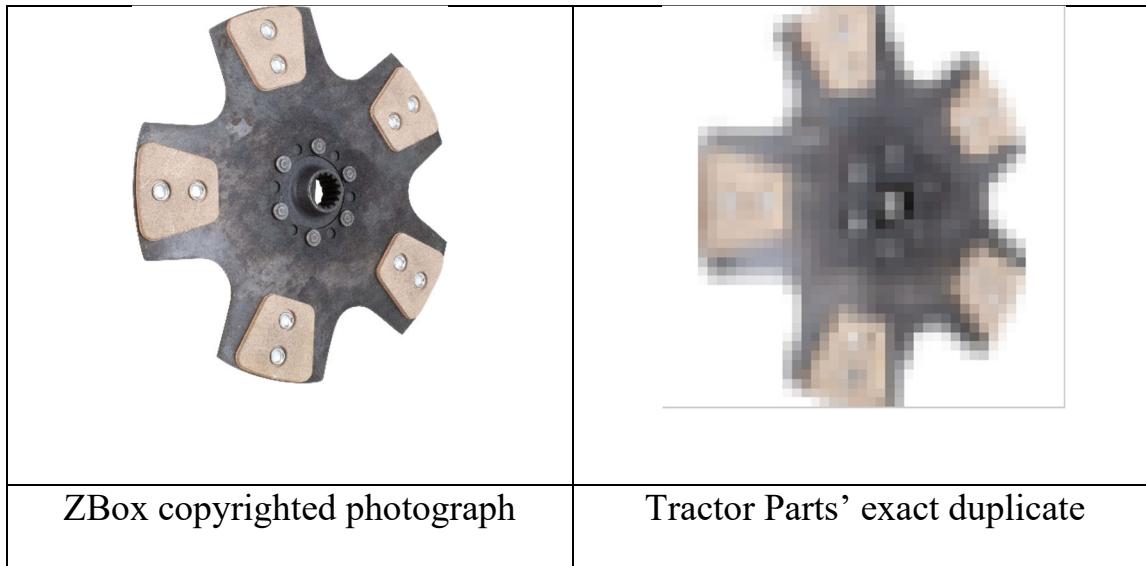
339. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 41 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-723)**

340. ZBox repeats and realleges the allegation contained in paragraphs 1 through 339 as if fully set forth herein.

341. ZBox registered its copyright for its original photograph for Disc AR63695-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-723, “the ‘723 copyright registration”). A true and correct copy of the ’723 copyright registration, and the original photograph that is the subject of the ’723 copyright registration are attached to this Complaint in Exhibit 41.

342. ZBox’s original photograph covered by the ’723 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



343. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '723 copyright registration, and therefore infringed the '723 copyright registration in violation of 17 U.S.C. §501.

344. Copies of ZBox's eBay listing showing its original photograph covered by '723 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 41.

345. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

346. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

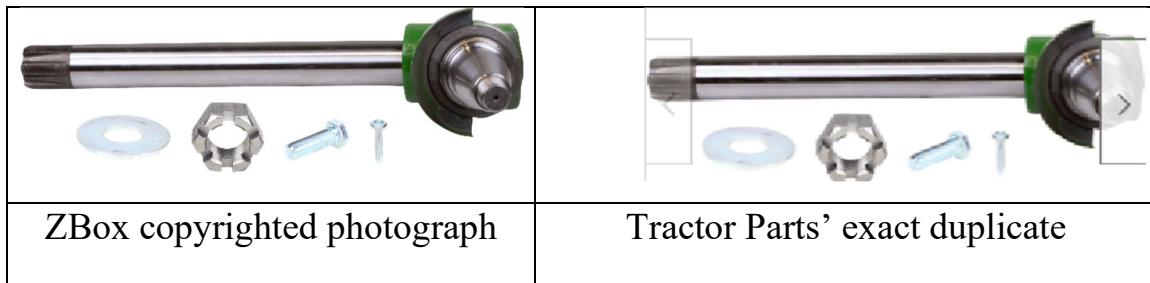
347. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 42 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-600)**

348. ZBox repeats and realleges the allegation contained in paragraphs 1 through 347 as if fully set forth herein.

349. ZBox registered its copyright for its original photograph for Spindle AR81954-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-600, “the ‘600 copyright registration”). A true and correct copy of the ‘600 copyright registration, and the original photograph that is the subject of the ‘600 copyright registration are attached to this Complaint in Exhibit 42.

350. ZBox’s original photograph covered by the ‘600 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



351. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '600 copyright registration, and therefore infringed the '600 copyright registration in violation of 17 U.S.C. §501.

352. Copies of ZBox's eBay listing showing its original photograph covered by '600 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 42.

353. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

354. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

355. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

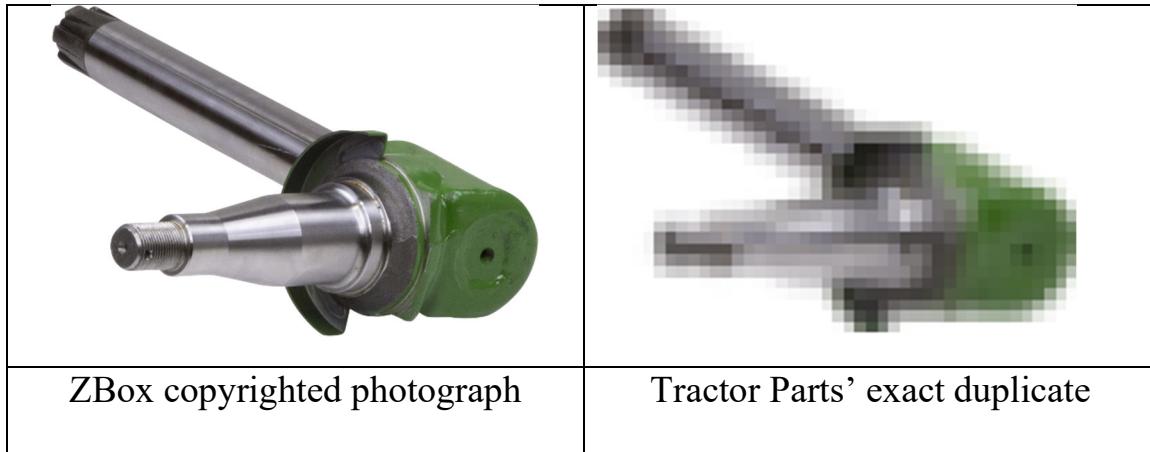
**Count 43 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-746)**

356. ZBox repeats and realleges the allegation contained in paragraphs 1 through 355 as if fully set forth herein.

357. ZBox registered its copyright for its original photograph for Spindle AR81954-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-746, "the '746 copyright registration"). A true and

correct copy of the '746 copyright registration, and the original photograph that is the subject of the '746 copyright registration are attached to this Complaint in Exhibit 43.

358. ZBox's original photograph covered by the '746 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



359. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '746 copyright registration, and therefore infringed the '746 copyright registration in violation of 17 U.S.C. §501.

360. Copies of ZBox's eBay listing showing its original photograph covered by '746 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 43.

361. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

362. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

363. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 44 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-720)**

364. ZBox repeats and realleges the allegation contained in paragraphs 1 through 363 as if fully set forth herein.

365. ZBox registered its copyright for its original photograph for Spindle AR81954-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-720, “the ‘720 copyright registration”). A true and correct copy of the ’720 copyright registration, and the original photograph that is the subject of the ’720 copyright registration are attached to this Complaint in Exhibit 44.

366. ZBox's original photograph covered by the ’720 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts' exact duplicate

367. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '720 copyright registration, and therefore infringed the '720 copyright registration in violation of 17 U.S.C. §501.

368. Copies of ZBox's eBay listing showing its original photograph covered by '720 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 44.

369. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

370. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

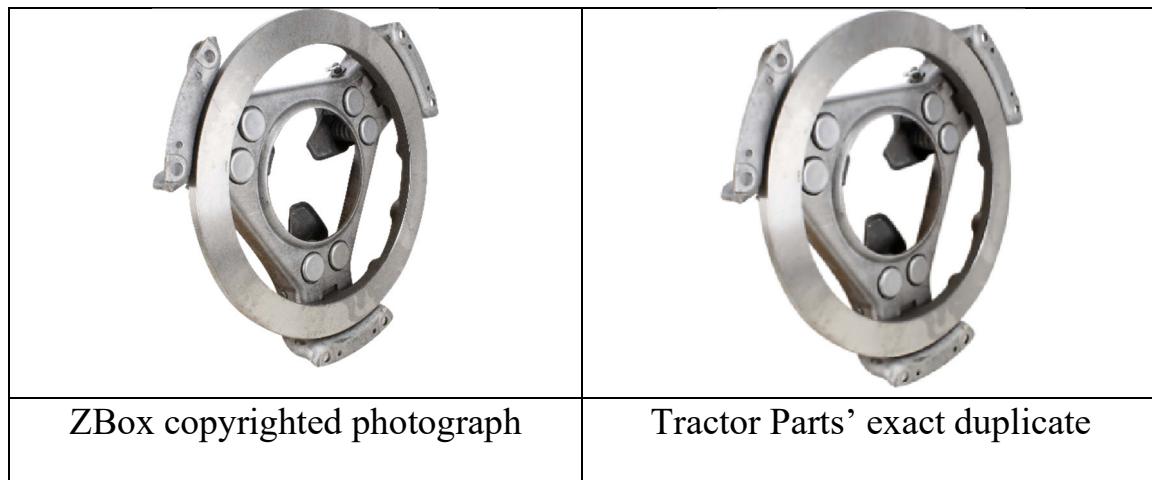
371. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 45 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-778)**

372. ZBox repeats and realleges the allegation contained in paragraphs 1 through 371 as if fully set forth herein.

373. ZBox registered its copyright for its original photograph for Plate AT43219-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-778, “the ‘8778 copyright registration”). A true and correct copy of the ’8778 copyright registration, and the original photograph that is the subject of the ’8778 copyright registration are attached to this Complaint in Exhibit 45.

374. ZBox’s original photograph covered by the ’8778 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



375. Without permission from ZBox, Tractor Parts copied and displayed ZBox’s photograph covered by ’8778 copyright registration, and therefore infringed the ’8778 copyright registration in violation of 17 U.S.C. §501.

376. Copies of ZBox's eBay listing showing its original photograph covered by '8778 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 45.

377. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

378. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

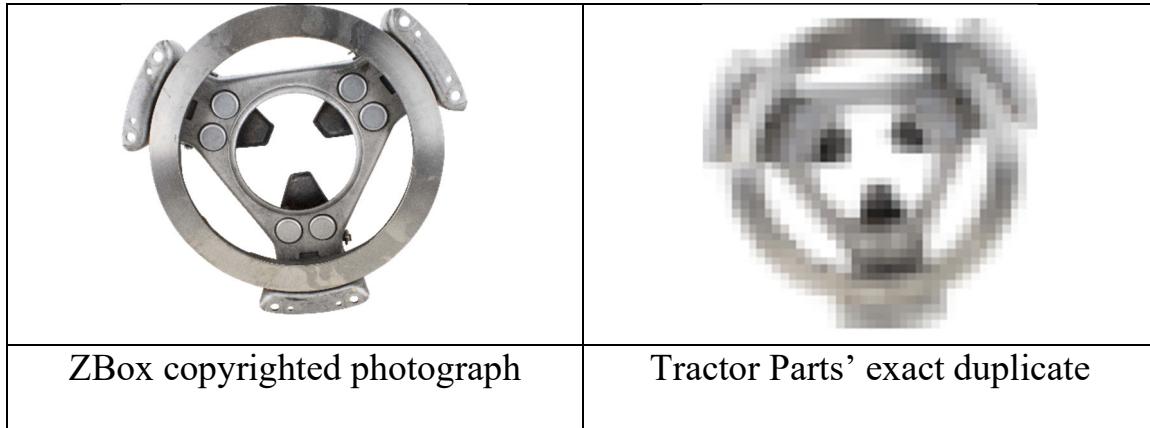
379. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 46 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-783)**

380. ZBox repeats and realleges the allegation contained in paragraphs 1 through 379 as if fully set forth herein.

381. ZBox registered its copyright for its original photograph for Plate AT43219-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-783, "the '783 copyright registration"). A true and correct copy of the '783 copyright registration, and the original photograph that is the subject of the '783 copyright registration are attached to this Complaint in Exhibit 46.

382. ZBox's original photograph covered by the '783 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



383. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '783 copyright registration, and therefore infringed the '783 copyright registration in violation of 17 U.S.C. §501.

384. Copies of ZBox's eBay listing showing its original photograph covered by '783 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 46.

385. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

386. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

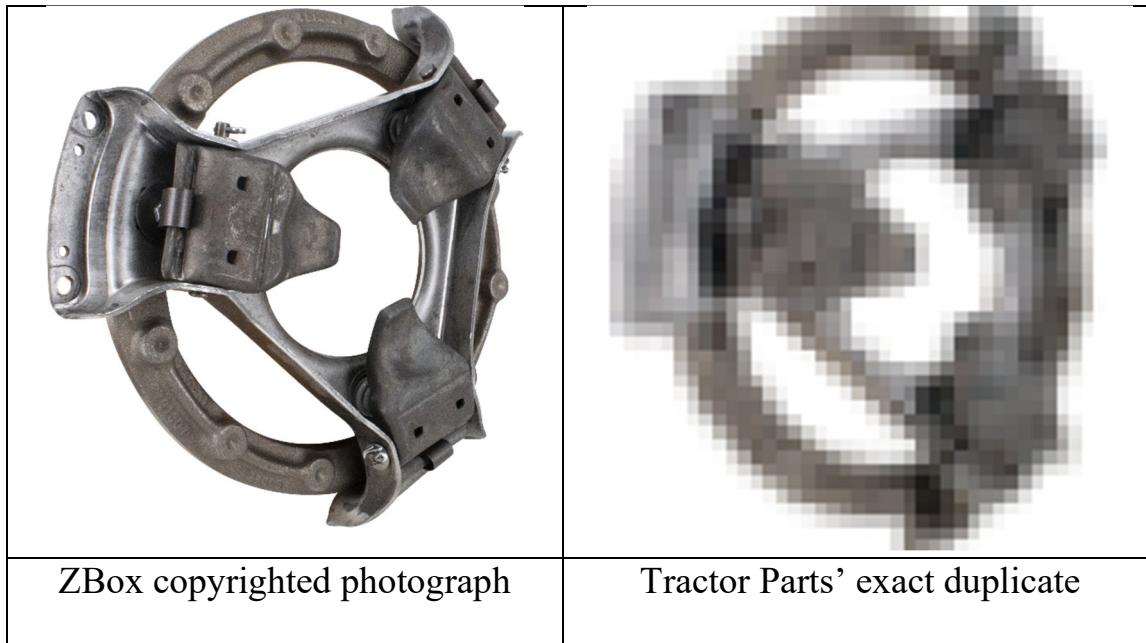
387. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 47 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-794)**

388. ZBox repeats and realleges the allegation contained in paragraphs 1 through 387 as if fully set forth herein.

389. ZBox registered its copyright for its original photograph for Plate AT43219-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-794, "the '794 copyright registration"). A true and correct copy of the '794 copyright registration, and the original photograph that is the subject of the '794 copyright registration are attached to this Complaint in Exhibit 47.

390. ZBox's original photograph covered by the '794 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



391. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '794 copyright registration, and therefore infringed the '794 copyright registration in violation of 17 U.S.C. §501.

392. Copies of ZBox's eBay listing showing its original photograph covered by '794 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 47.

393. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

394. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

395. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 48 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-786)**

396. ZBox repeats and realleges the allegation contained in paragraphs 1 through 395 as if fully set forth herein.

397. ZBox registered its copyright for its original photograph for Water Pump C5NE8501A-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-786, “the ‘786 copyright registration”). A true and correct copy of the ‘786 copyright registration, and the original photograph that is the subject of the ‘786 copyright registration are attached to this Complaint in Exhibit 48.

398. ZBox’s original photograph covered by the ‘786 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts' exact duplicate

399. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '786 copyright registration, and therefore infringed the '786 copyright registration in violation of 17 U.S.C. §501.

400. Copies of ZBox's eBay listing showing its original photograph covered by '786 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 48.

401. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

402. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

403. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

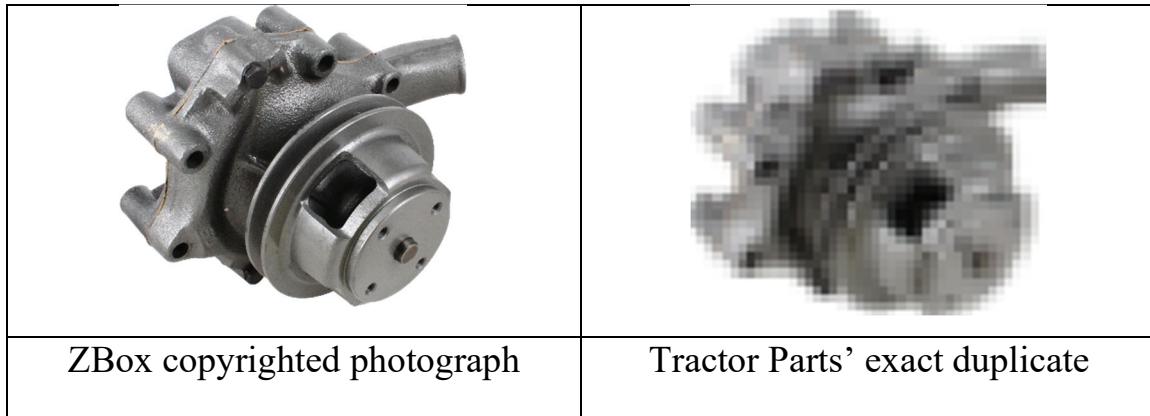
**Count 49 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-785)**

404. ZBox repeats and realleges the allegation contained in paragraphs 1 through 403 as if fully set forth herein.

405. ZBox registered its copyright for its original photograph for Water Pump C5NE8501A-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-785, "the '785 copyright registration"). A true and

correct copy of the '785 copyright registration, and the original photograph that is the subject of the '785 copyright registration are attached to this Complaint in Exhibit 49.

406. ZBox's original photograph covered by the '785 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



407. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '785 copyright registration, and therefore infringed the '785 copyright registration in violation of 17 U.S.C. §501.

408. Copies of ZBox's eBay listing showing its original photograph covered by '785 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 49.

409. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

410. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

411. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 50 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-994)**

412. ZBox repeats and realleges the allegation contained in paragraphs 1 through 411 as if fully set forth herein.

413. ZBox registered its copyright for its original photograph for Water Pump C5NE8501A-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-994, "the '994 copyright registration"). A true and correct copy of the '994 copyright registration, and the original photograph that is the subject of the '994 copyright registration are attached to this Complaint in Exhibit 50.

414. ZBox's original photograph covered by the '994 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:

		
ZBox copyrighted photograph	Tractor Parts' exact duplicate	

415. Without permission from ZBox, Tractor Parts copied and displayed

ZBox's photograph covered by '994 copyright registration, and therefore infringed the '994 copyright registration in violation of 17 U.S.C. §501.

416. Copies of ZBox's eBay listing showing its original photograph covered by '994 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 50.

417. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

418. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

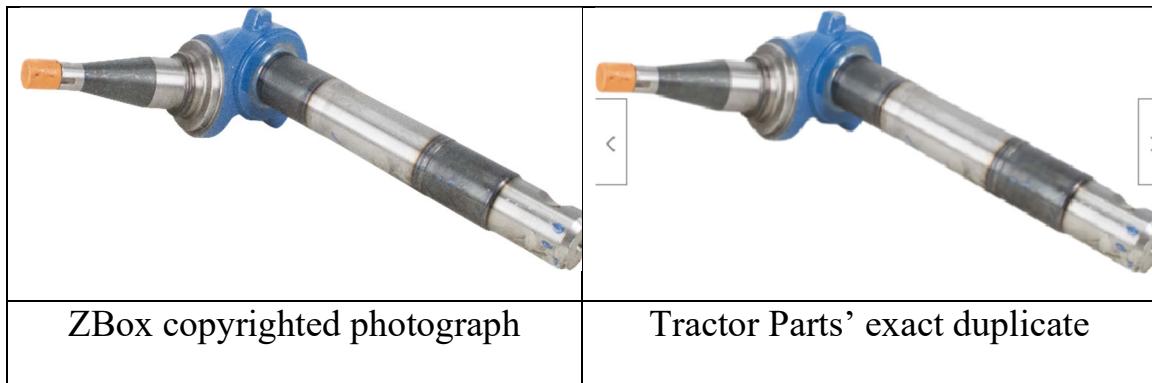
419. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 51 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-607)**

420. ZBox repeats and realleges the allegation contained in paragraphs 1 through 419 as if fully set forth herein.

421. ZBox registered its copyright for its original photograph for Spindle C5NN3106J-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-607, “the ‘607 copyright registration”). A true and correct copy of the ‘607 copyright registration, and the original photograph that is the subject of the ‘607 copyright registration are attached to this Complaint in Exhibit 51.

422. ZBox’s original photograph covered by the ‘607 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



423. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '607 copyright registration, and therefore infringed the '607 copyright registration in violation of 17 U.S.C. §501.

424. Copies of ZBox's eBay listing showing its original photograph covered by '607 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 51.

425. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

426. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

427. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

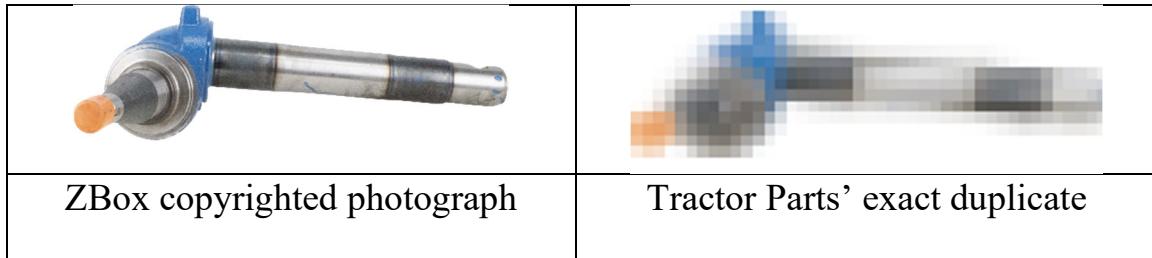
**Count 52 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-604)**

428. ZBox repeats and realleges the allegation contained in paragraphs 1 through 427 as if fully set forth herein.

429. ZBox registered its copyright for its original photograph for Spindle C5NN3106J-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-604, "the '604 copyright registration"). A true and

correct copy of the '604 copyright registration, and the original photograph that is the subject of the '604 copyright registration are attached to this Complaint in Exhibit 52.

430. ZBox's original photograph covered by the '604 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



431. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '604 copyright registration, and therefore infringed the '604 copyright registration in violation of 17 U.S.C. §501.

432. Copies of ZBox's eBay listing showing its original photograph covered by '604 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 52.

433. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

434. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

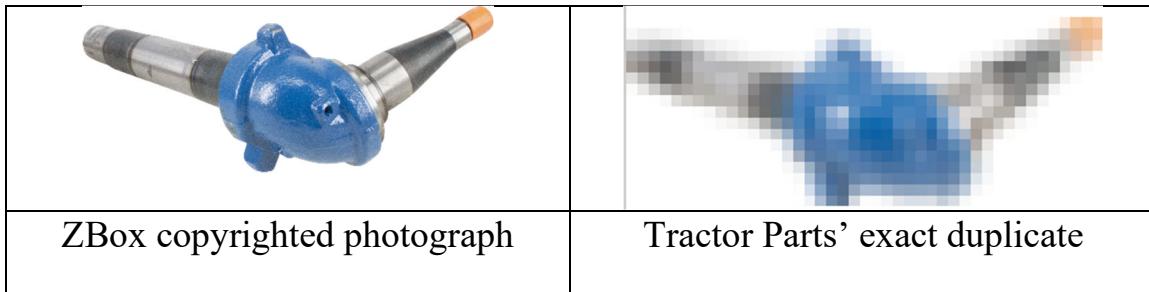
435. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 53 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-602)**

436. ZBox repeats and realleges the allegation contained in paragraphs 1 through 435 as if fully set forth herein.

437. ZBox registered its copyright for its original photograph for Spindle C5NN3106J-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-602, "the '602 copyright registration"). A true and correct copy of the '602 copyright registration, and the original photograph that is the subject of the '602 copyright registration are attached to this Complaint in Exhibit 53.

438. ZBox's original photograph covered by the '602 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



439. Without permission from ZBox, Tractor Parts copied and displayed

ZBox's photograph covered by '602 copyright registration, and therefore infringed the '602 copyright registration in violation of 17 U.S.C. §501.

440. Copies of ZBox's eBay listing showing its original photograph covered by '602 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 53.

441. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

442. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

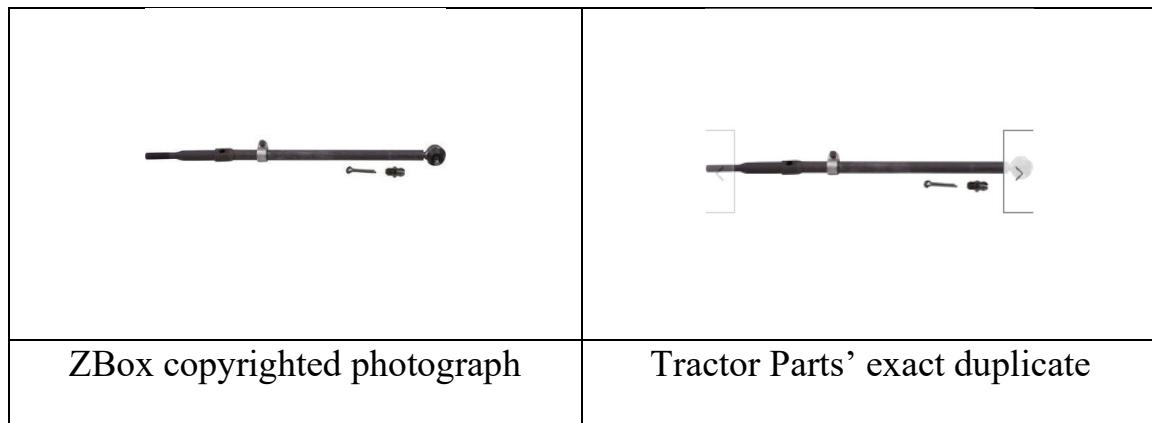
443. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 54 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-596)**

444. ZBox repeats and realleges the allegation contained in paragraphs 1 through 443 as if fully set forth herein.

445. ZBox registered its copyright for its original photograph for Tie Rod C5NN3307G-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-596, “the ‘596 copyright registration”). A true and correct copy of the ’596 copyright registration, and the original photograph that is the subject of the ’596 copyright registration are attached to this Complaint in Exhibit 54.

446. ZBox’s original photograph covered by the ’596 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



447. Without permission from ZBox, Tractor Parts copied and displayed ZBox’s photograph covered by ’596 copyright registration, and therefore infringed the ’596 copyright registration in violation of 17 U.S.C. §501.

448. Copies of ZBox's eBay listing showing its original photograph covered by '596 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 54.

449. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

450. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

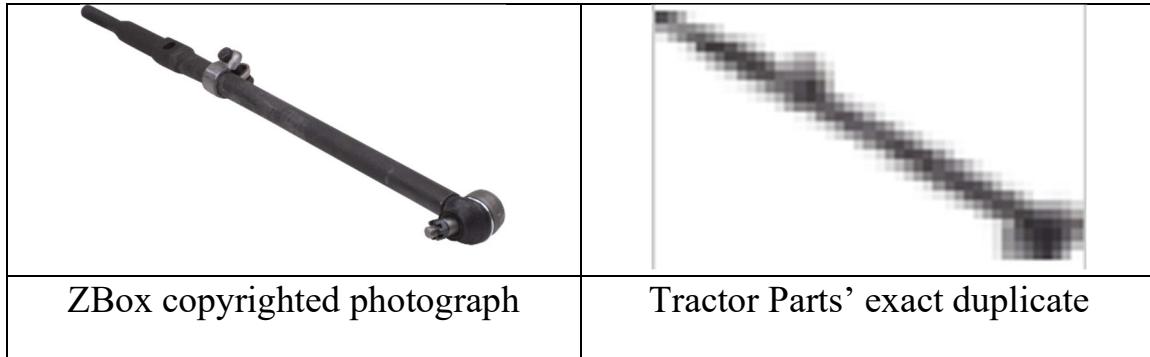
451. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 55 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-599)**

452. ZBox repeats and realleges the allegation contained in paragraphs 1 through 451 as if fully set forth herein.

453. ZBox registered its copyright for its original photograph for Tie Rod C5NN3307G-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-599, "the '599 copyright registration"). A true and correct copy of the '599 copyright registration, and the original photograph that is the subject of the '599 copyright registration are attached to this Complaint in Exhibit 55.

454. ZBox's original photograph covered by the '599 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



455. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '599 copyright registration, and therefore infringed the '599 copyright registration in violation of 17 U.S.C. §501.

456. Copies of ZBox's eBay listing showing its original photograph covered by '599 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 55.

457. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

458. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

459. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 56 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-588)**

460. ZBox repeats and realleges the allegation contained in paragraphs 1 through 459 as if fully set forth herein.

461. ZBox registered its copyright for its original photograph for Tie Rod C5NN3307G-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-588, “the ‘588 copyright registration”). A true and correct copy of the ‘588 copyright registration, and the original photograph that is the subject of the ‘588 copyright registration are attached to this Complaint in Exhibit 56.

462. ZBox’s original photograph covered by the ‘588 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

463. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '588 copyright registration, and therefore infringed the '588 copyright registration in violation of 17 U.S.C. §501.

464. Copies of ZBox's eBay listing showing its original photograph covered by '588 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 56.

465. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

466. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

467. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

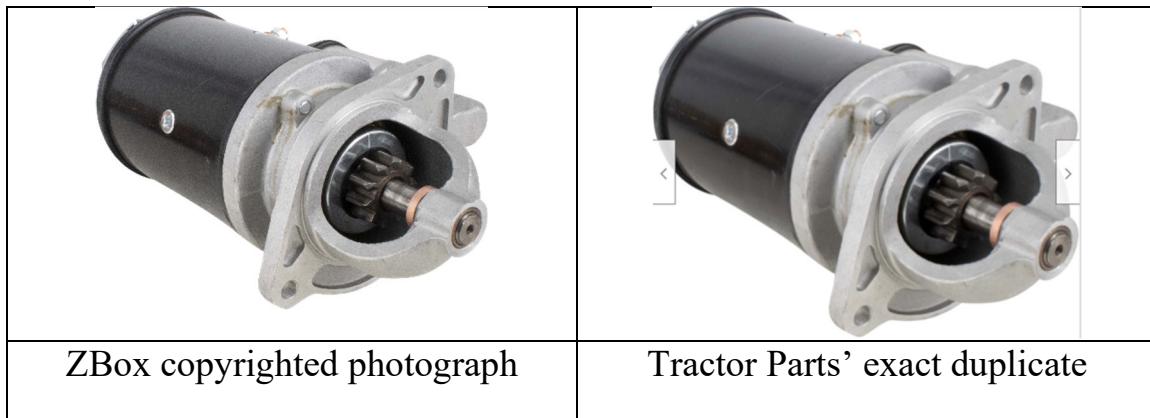
**Count 57 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-586)**

468. ZBox repeats and realleges the allegation contained in paragraphs 1 through 467 as if fully set forth herein.

469. ZBox registered its copyright for its original photograph for Starter D0NN11000A-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-586, "the '586 copyright registration"). A true and

correct copy of the '586 copyright registration, and the original photograph that is the subject of the '586 copyright registration are attached to this Complaint in Exhibit 57.

470. ZBox's original photograph covered by the '586 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



471. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '586 copyright registration, and therefore infringed the '586 copyright registration in violation of 17 U.S.C. §501.

472. Copies of ZBox's eBay listing showing its original photograph covered by '586 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 57.

473. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

474. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

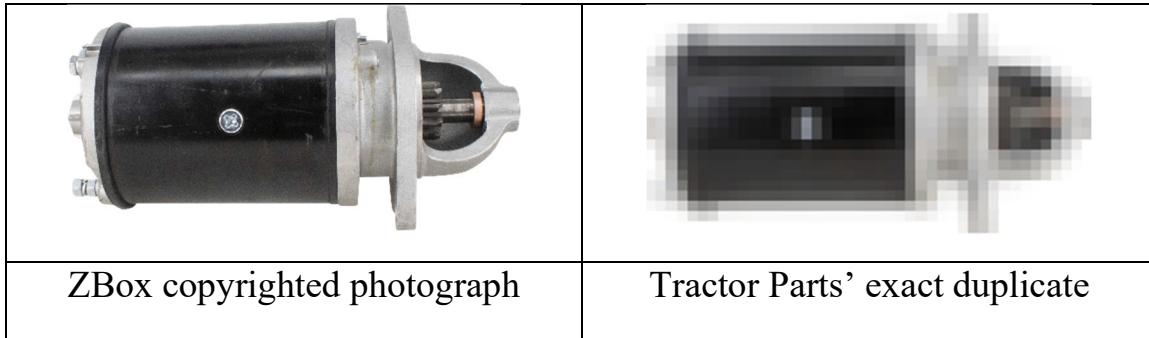
475. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 58 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-589)**

476. ZBox repeats and realleges the allegation contained in paragraphs 1 through 475 as if fully set forth herein.

477. ZBox registered its copyright for its original photograph for Starter D0NN11000A-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-589, “the ‘589 copyright registration”). A true and correct copy of the ’589 copyright registration, and the original photograph that is the subject of the ’589 copyright registration are attached to this Complaint in Exhibit 58.

478. ZBox's original photograph covered by the ’589 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



479. Without permission from ZBox, Tractor Parts copied and displayed

ZBox's photograph covered by '589 copyright registration, and therefore infringed the '589 copyright registration in violation of 17 U.S.C. §501.

480. Copies of ZBox's eBay listing showing its original photograph covered by '589 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 58.

481. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

482. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

483. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 59 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-591)**

484. ZBox repeats and realleges the allegation contained in paragraphs 1 through 483 as if fully set forth herein.

485. ZBox registered its copyright for its original photograph for Starter D0NN11000A-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-591, “the ‘591 copyright registration”). A true and correct copy of the ‘591 copyright registration, and the original photograph that is the subject of the ‘591 copyright registration are attached to this Complaint in Exhibit 59.

486. ZBox’s original photograph covered by the ‘591 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts' exact duplicate

487. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '591 copyright registration, and therefore infringed the '591 copyright registration in violation of 17 U.S.C. §501.

488. Copies of ZBox's eBay listing showing its original photograph covered by '591 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 59.

489. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

490. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

491. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 60 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-750)**

492. ZBox repeats and realleges the allegation contained in paragraphs 1 through 491 as if fully set forth herein.

493. ZBox registered its copyright for its original photograph for Cylinder D4NN3A540A-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-750, "the '750 copyright registration"). A true and

correct copy of the '750 copyright registration, and the original photograph that is the subject of the '750 copyright registration are attached to this Complaint in Exhibit 60.

494. ZBox's original photograph covered by the '750 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



495. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '750 copyright registration, and therefore infringed the '750 copyright registration in violation of 17 U.S.C. §501.

496. Copies of ZBox's eBay listing showing its original photograph covered by '750 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 60.

497. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

498. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

499. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 61 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-877)**

500. ZBox repeats and realleges the allegation contained in paragraphs 1 through 499 as if fully set forth herein.

501. ZBox registered its copyright for its original photograph for Cylinder D4NN3A540A-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-877, “the ‘877 copyright registration”). A true and correct copy of the ’877 copyright registration, and the original photograph that is the subject of the ’877 copyright registration are attached to this Complaint in Exhibit 61.

502. ZBox's original photograph covered by the ’877 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts' exact duplicate

503. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '877 copyright registration, and therefore infringed the '877 copyright registration in violation of 17 U.S.C. §501.

504. Copies of ZBox's eBay listing showing its original photograph covered by '877 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 61.

505. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

506. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

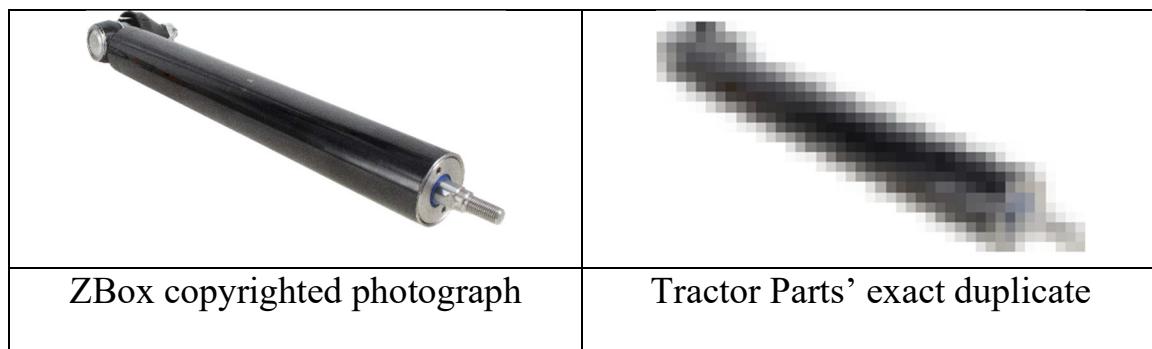
507. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 62 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-874)**

508. ZBox repeats and realleges the allegation contained in paragraphs 1 through 507 as if fully set forth herein.

509. ZBox registered its copyright for its original photograph for Cylinder D4NN3A540A-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-874, “the ‘874 copyright registration”). A true and correct copy of the ’874 copyright registration, and the original photograph that is the subject of the ’874 copyright registration are attached to this Complaint in Exhibit 62.

510. ZBox’s original photograph covered by the ’874 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



511. Without permission from ZBox, Tractor Parts copied and displayed ZBox’s photograph covered by ’874 copyright registration, and therefore infringed the ’874 copyright registration in violation of 17 U.S.C. §501.

512. Copies of ZBox's eBay listing showing its original photograph covered by '874 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 62.

513. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

514. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

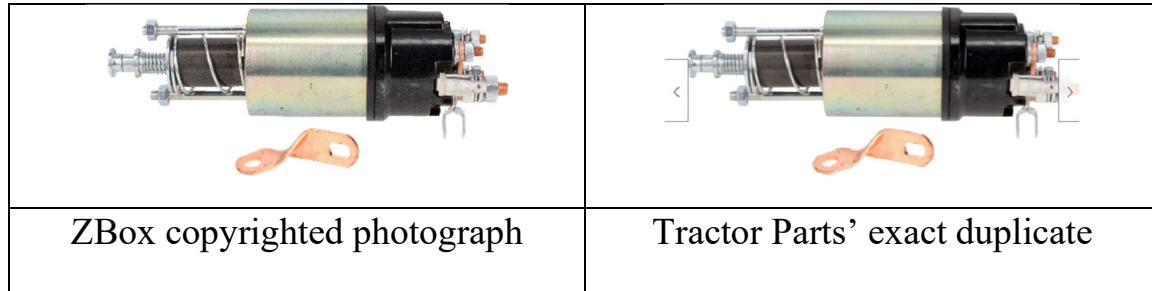
515. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 63 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-307-816)**

516. ZBox repeats and realleges the allegation contained in paragraphs 1 through 515 as if fully set forth herein.

517. ZBox registered its copyright for its original photograph for Solenoid D7NN11390B-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-816, "the '816 copyright registration"). A true and correct copy of the '816 copyright registration, and the original photograph that is the subject of the '816 copyright registration are attached to this Complaint in Exhibit 63.

518. ZBox's original photograph covered by the '816 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



519. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '816 copyright registration, and therefore infringed the '816 copyright registration in violation of 17 U.S.C. §501.

520. Copies of ZBox's eBay listing showing its original photograph covered by '816 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 63.

521. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

522. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

523. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 64 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-998)**

524. ZBox repeats and realleges the allegation contained in paragraphs 1 through 523 as if fully set forth herein.

525. ZBox registered its copyright for its original photograph for Solenoid D7NN11390B-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-998, “the ‘998 copyright registration”). A true and correct copy of the ‘998 copyright registration, and the original photograph that is the subject of the ‘998 copyright registration are attached to this Complaint in Exhibit 64.

526. ZBox’s original photograph covered by the ‘998 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

527. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '998 copyright registration, and therefore infringed the '998 copyright registration in violation of 17 U.S.C. §501.

528. Copies of ZBox's eBay listing showing its original photograph covered by '998 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 64.

529. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

530. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

531. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

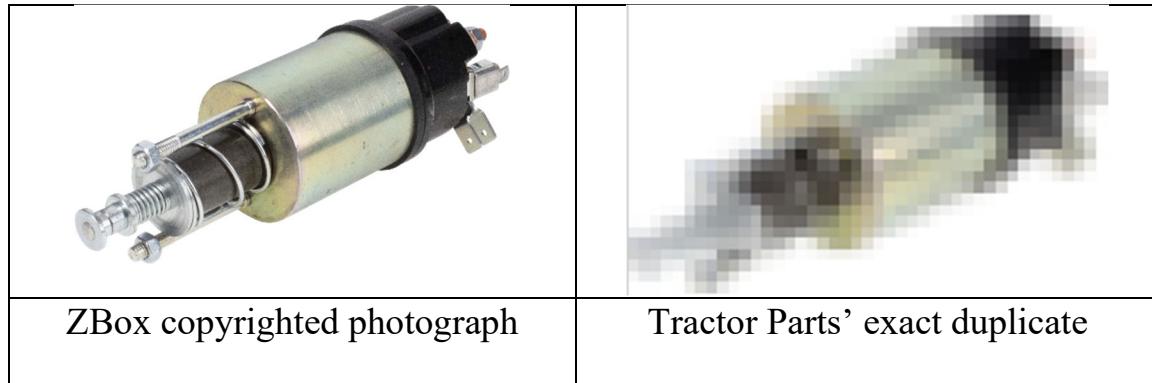
**Count 65 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-002)**

532. ZBox repeats and realleges the allegation contained in paragraphs 1 through 531 as if fully set forth herein.

533. ZBox registered its copyright for its original photograph for Solenoid D7NN11390B-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-002, "the '002 copyright registration"). A true and

correct copy of the '002 copyright registration, and the original photograph that is the subject of the '002 copyright registration are attached to this Complaint in Exhibit 65.

534. ZBox's original photograph covered by the '002 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



535. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '002 copyright registration, and therefore infringed the '002 copyright registration in violation of 17 U.S.C. §501.

536. Copies of ZBox's eBay listing showing its original photograph covered by '002 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 65.

537. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

538. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

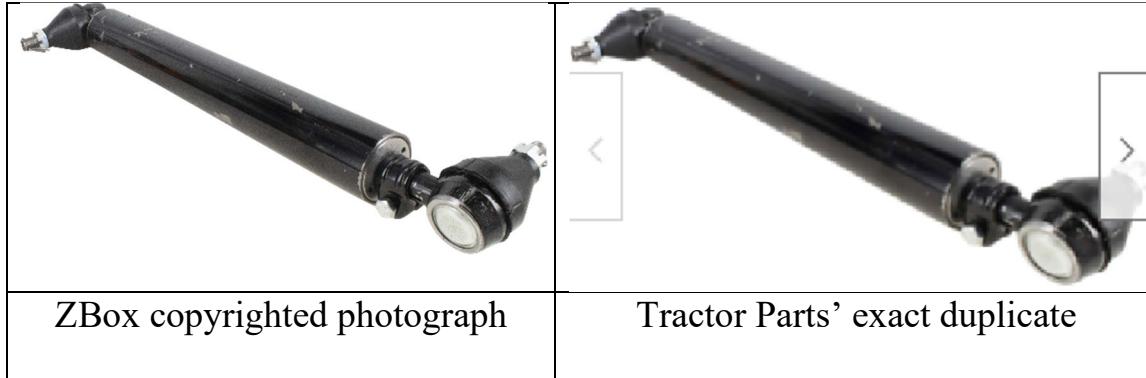
539. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 66 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-871)**

540. ZBox repeats and realleges the allegation contained in paragraphs 1 through 539 as if fully set forth herein.

541. ZBox registered its copyright for its original photograph for Cylinder E2NN3A540BA-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-871, "the '871 copyright registration"). A true and correct copy of the '871 copyright registration, and the original photograph that is the subject of the '871 copyright registration are attached to this Complaint in Exhibit 66.

542. ZBox's original photograph covered by the '871 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



543. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '871 copyright registration, and therefore infringed the '871 copyright registration in violation of 17 U.S.C. §501.

544. Copies of ZBox's eBay listing showing its original photograph covered by '871 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 66.

545. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

546. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

547. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 67 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-306-642)**

548. ZBox repeats and realleges the allegation contained in paragraphs 1 through 547 as if fully set forth herein.

549. ZBox registered its copyright for its original photograph for Cylinder E2NN3A540BA-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-642, “the ‘642 copyright registration”). A true and correct copy of the ’642 copyright registration, and the original photograph that is the subject of the ’642 copyright registration are attached to this Complaint in Exhibit 67.

550. ZBox’s original photograph covered by the ’642 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts’ exact duplicate

551. Without permission from ZBox, Tractor Parts copied and displayed ZBox’s photograph covered by ’642 copyright registration, and therefore infringed the ’642 copyright registration in violation of 17 U.S.C. §501.

552. Copies of ZBox's eBay listing showing its original photograph covered by '642 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 67.

553. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

554. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

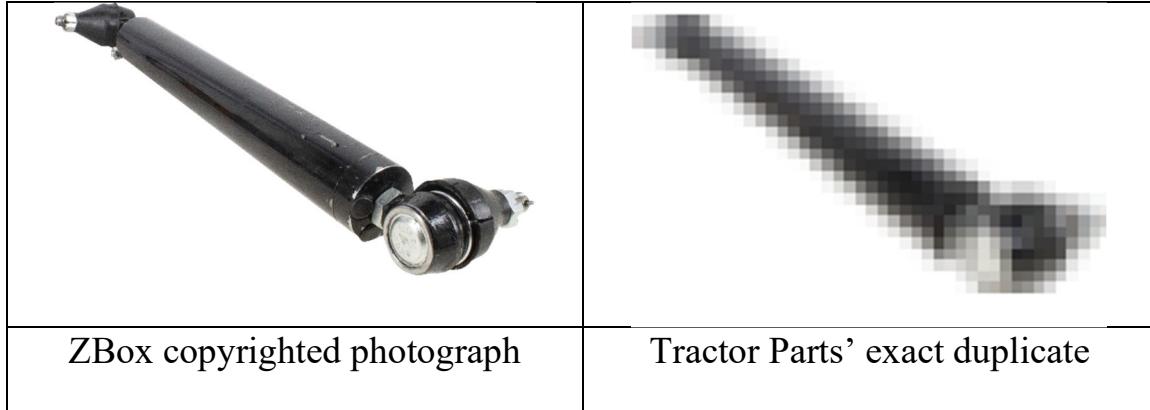
555. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 68 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-306-640)**

556. ZBox repeats and realleges the allegation contained in paragraphs 1 through 555 as if fully set forth herein.

557. ZBox registered its copyright for its original photograph for Cylinder E2NN3A540BA-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-640, "the '640 copyright registration"). A true and correct copy of the '640 copyright registration, and the original photograph that is the subject of the '640 copyright registration are attached to this Complaint in Exhibit 68.

558. ZBox's original photograph covered by the '640 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



559. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '640 copyright registration, and therefore infringed the '640 copyright registration in violation of 17 U.S.C. §501.

560. Copies of ZBox's eBay listing showing its original photograph covered by '640 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 68.

561. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

562. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

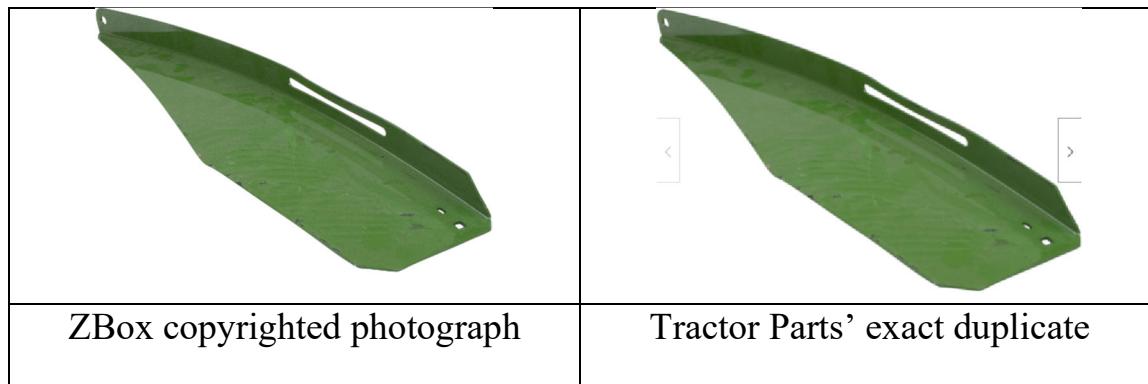
563. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 69 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-306-641)**

564. ZBox repeats and realleges the allegation contained in paragraphs 1 through 563 as if fully set forth herein.

565. ZBox registered its copyright for its original photograph for Vane H222456-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-306-641, “the ‘641 copyright registration”). A true and correct copy of the ’641 copyright registration, and the original photograph that is the subject of the ’641 copyright registration are attached to this Complaint in Exhibit 69.

566. ZBox’s original photograph covered by the ’641 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:



567. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '641 copyright registration, and therefore infringed the '641 copyright registration in violation of 17 U.S.C. §501.

568. Copies of ZBox's eBay listing showing its original photograph covered by '641 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 69.

569. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

570. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

571. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

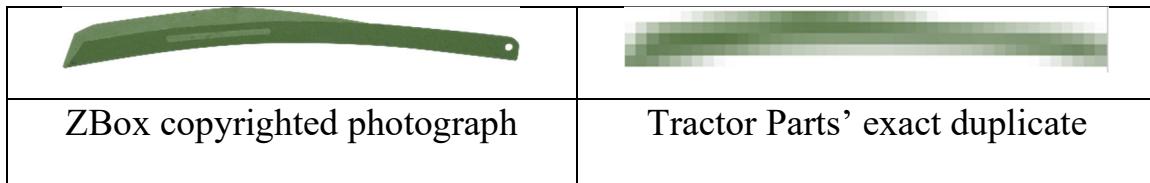
**Count 70 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-308-548)**

572. ZBox repeats and realleges the allegation contained in paragraphs 1 through 571 as if fully set forth herein.

573. ZBox registered its copyright for its original photograph for Vane H222456-P2 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-548, "the '548 copyright registration"). A true and correct copy

of the '548 copyright registration, and the original photograph that is the subject of the '548 copyright registration are attached to this Complaint in Exhibit 70.

574. ZBox's original photograph covered by the '548 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



575. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '548 copyright registration, and therefore infringed the '548 copyright registration in violation of 17 U.S.C. §501.

576. Copies of ZBox's eBay listing showing its original photograph covered by '548 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 70.

577. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

578. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

579. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 71 – Copyright Infringement**  
**(Infringement of Copyright Registration No. VA 2-308-555)**

580. ZBox repeats and realleges the allegation contained in paragraphs 1 through 579 as if fully set forth herein.

581. ZBox registered its copyright for its original photograph for Vane H222456-P3 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-308-555, “the ‘555 copyright registration”). A true and correct copy of the ‘555 copyright registration, and the original photograph that is the subject of the ‘555 copyright registration are attached to this Complaint in Exhibit 71.

582. ZBox’s original photograph covered by the ‘555 copyright registration and a copy of a portion of Tractor Parts’ eBay listing that displays ZBox’s original photographs are shown:

	
ZBox copyrighted photograph	Tractor Parts' exact duplicate

583. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '555 copyright registration, and therefore infringed the '555 copyright registration in violation of 17 U.S.C. §501.

584. Copies of ZBox's eBay listing showing its original photograph covered by '555 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 71.

585. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

586. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

587. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

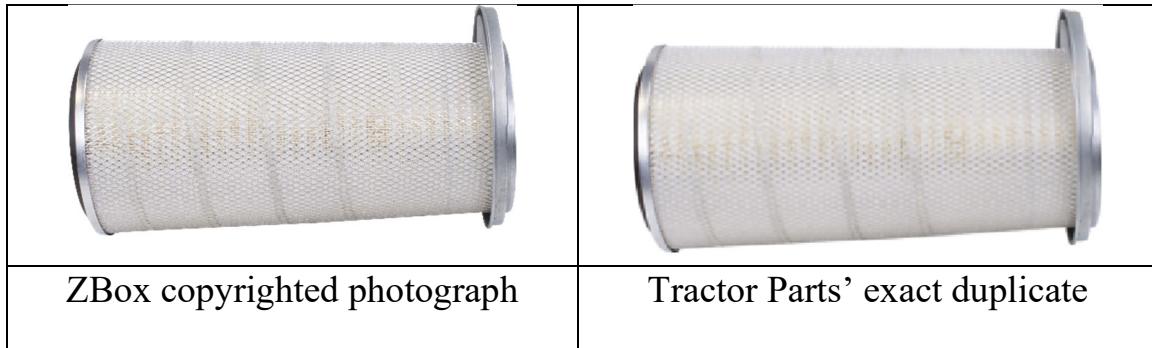
**Count 72 – Copyright Infringement  
(Infringement of Copyright Registration No. VA 2-307-788)**

588. ZBox repeats and realleges the allegation contained in paragraphs 1 through 587 as if fully set forth herein.

589. ZBox registered its copyright for its original photograph for Air Filter P153551-P1 with the U.S. Copyright Office in accordance with applicable copyright statutes, Title 17 United States Code, such copyright being assigned Registration Number VA 2-307-788, "the '788 copyright registration"). A true and correct copy

of the '788 copyright registration, and the original photograph that is the subject of the '788 copyright registration are attached to this Complaint in Exhibit 72.

590. ZBox's original photograph covered by the '788 copyright registration and a copy of a portion of Tractor Parts' eBay listing that displays ZBox's original photographs are shown:



591. Without permission from ZBox, Tractor Parts copied and displayed ZBox's photograph covered by '788 copyright registration, and therefore infringed the '788 copyright registration in violation of 17 U.S.C. §501.

592. Copies of ZBox's eBay listing showing its original photograph covered by '788 copyright registration and Tractor Parts' eBay listing exactly duplicating ZBox's copyrighted photograph are also shown in Exhibit 72.

593. Tractor Parts' copying and display of ZBox's copyrighted photograph and its infringement of ZBox's copyright has been, and continues to be, willful and deliberate.

594. Tractor Parts' infringement of ZBox's copyright has caused, is causing, and will continue to cause irreparable injury to ZBox.

595. Unless enjoined Tractor Parts' will continue its violation of ZBox's copyright rights.

**Count 73 - Violation of Section 43(a) of the Lanham Act  
(Unfair Competition)**

596. ZBox repeats and realleges the allegations contained in paragraphs 1 through 595 as if fully set forth herein.

597. Tractor Parts has used, and is continuing to use, in interstate commerce and without authorization from ZBox, copies of dozens of ZBox's photographs.

598. Tractor Parts' use in commerce of copies of ZBox's photographs in connection with its advertising, promotion, distribution, and offering for sale of Tractor Parts' products is likely to cause confusion, to cause mistake, and/or to deceive purchasers as to the source of the Tractor Parts' products or as to Tractor Parts' affiliation, connection, approval, sponsorship, or association with ZBox.

599. Tractor Parts' use in commerce of copies of ZBox's photographs in connection with its commercial advertising, misrepresents the nature, characteristics, or qualities of its goods or commercial activities.

600. Tractor Parts' actions constitute unfair competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

601. Tractor Parts' use of copies of ZBox's copyrighted photographs in interstate commerce has caused, is causing, and will continue to cause damage to ZBox's business, reputation, goodwill, profits.

602. On information and belief, and by virtue of the widespread unauthorized copying, Tractor Parts was actively aware of ZBox and its copyright rights in its photographs when Tractor Parts copied and displayed ZBox's copyright photographs. Tractor Parts, knew it was copying ZBox's pictures and in disregard of ZBox's rights, proceeded anyway to copy and display the unauthorized copies and is continuing to do so, thus rendering Tractor Parts' use of ZBox's copyrighted photographs willful and deliberate.

**Count 74 - Violation of Michigan Consumer Protection Act  
(M.C.L. § 445.903)**

603. ZBox repeats and realleges the allegations contained in paragraphs 1 through 602 as if fully set forth herein.

604. Tractor Parts' acts constitute unfair, unconscionable, or deceptive methods, acts or practices in conducting trade or commerce in violation of M.C.L. § 445.903.

605. Tractor Parts' use of ZBox's copyrighted photographs causes a probability of confusion or misunderstanding as to the source, sponsorship, or approval, of goods or services in violation of M.C.L. § 445.903(1)(a).

606. Tractor Parts uses deceptive representations in connection with its goods in violation of M.C.L. § 445.903(1)(b).

607. Tractor Parts represents that its goods have sponsorship, approval, characteristics, ingredients, uses, benefits, or qualities that they do not have in violation of M.C.L. § 445.903(1)(c).

608. Tractor Parts' actions have caused and, unless enjoined by this Court, will continue to cause substantial injury and loss to the public and to ZBox. Based on Tractor Parts' unlawful activities, ZBox is entitled to injunctive relief and to recover damages, and as appropriate, punitive damages, costs and reasonable attorneys' fees.

#### **Count 75 – Common Law Unfair Competition**

609. ZBox repeats and realleges the allegations contained in paragraphs 1 through 608 as if fully set forth herein.

610. Tractor Parts was aware that the pictures it copied from ZBox and yet Tractor Parts copied and displayed ZBox's copyrighted photographs in disregard of ZBox's rights.

611. Tractor Parts' actions have resulted in the misappropriation of, and trading upon, ZBox's valuable goodwill and business reputation at ZBox's expense and at no expense to Tractor Parts. The effect of Tractor Parts' misappropriation of

ZBox's copyrighted photographs is likely to unjustly enrich Tractor Parts, damage ZBox and confuse and/or deceive the public.

612. Tractor Parts' actions constitute unfair competition with ZBox, which has caused and will continue to cause irreparable injury to ZBox, its goodwill and its reputation unless enjoined.

613. An award of money damages alone cannot fully compensate ZBox for its injuries, and ZBox has no adequate remedy at law.

### **Count 76 – Unjust Enrichment**

614. ZBox repeats and realleges the allegations contained in paragraphs 1 through 613 as if fully set forth herein.

615. By misappropriating ZBox's valuable goodwill and reputation through the improper copying and display of ZBox's copyrighted photographs, Tractor Parts has been unjustly enriched to the detriment of ZBox.

616. Tractor Parts is realizing profit and will continue to realize a profit from its improper copying and display of ZBox's copyrighted photographs.

617. An award of money damages alone cannot fully compensate ZBox for its injuries, and ZBox has no adequate remedy at law.

618. ZBox is entitled to compensatory damages in the form of restitution and such other and further relief as the Court deems equitable and just.

**RELIEF REQUESTED**

WHEREFORE, ZBox respectfully requests that this Court enter a judgment that:

- A. Finds Tractor Parts' unauthorized reproduction and displaying of ZBox's copyrighted photograph, which is the subject of the '562 copyright registration, in connection with the Tractor Parts products infringes the '562 copyright registration in violation of 17 U.S.C. § 501;
- B. Awards ZBox damages to compensate for Tractor Parts' copyright infringement pursuant to 17 U.S.C. § 504, including ZBox's actual damages and any additional profits of Tractor Parts or, in the alternative statutory damages of up to \$150,000.00 per work because of the willful nature of Tractor Parts' infringement;
- C. Awards ZBox its full costs, including attorney fees, stemming from Tractor Parts' copyright infringement pursuant to 17 U.S.C. § 505;
- D. Orders the impounding of all items that violate the exclusive rights of ZBox in its registered copyright pursuant to 17 U.S.C. § 503;
- E. Orders Tractor Parts and its officers, directors, agents, servants, employees, successors, assigns, and all persons in active concert or participation with it, be preliminarily and permanently enjoined from infringing the '562 copyright registration pursuant to 17 U.S.C. § 505;

F. Finds Tractor Parts' use in commerce of copies ZBox's copyrighted photographs constitutes unfair competition in violation of 15 U.S.C. § 1125(a);

G. Awards ZBox all profits gained by Tractor Parts as a result of Tractor Parts' unfair competition, increased to an amount this Court deems just, pursuant 15 U.S.C. § 1117;

H. Awards ZBox actual damages sustained as a result of Tractor Parts' unfair competition, increased by up to three times, pursuant 15 U.S.C. § 1117;

I. Awards ZBox its costs and any additional damages to which ZBox is entitled as a result of Tractor Parts' unfair competition;

J. Finds this case to be exceptional and awards ZBox its reasonable attorney fees pursuant 15 U.S.C. § 1117;

K. Orders Tractor Parts and its officers, directors, agents, servants, employees, successors, assigns, and all persons in active concert or participation with it, be preliminarily and permanently enjoined from unfairly competing with ZBox by copying and displaying ZBox's copyrighted photographs;

L. Orders Tractor Parts to recall from any distributors, shippers, resellers, retailers, or wholesalers any and all advertising, products, packaging or any other items that display copies of ZBox's photographs;

M. Orders Tractor Parts to deliver to ZBox any and all advertising, products, packaging, or any other items that display copies of ZBox's photographs;

N. Awards ZBox actual damages sustained as a result of Tractor Parts' violations of M.C.L. § 445.903 together with reasonable attorneys' fees pursuant to M.C.L. § 445.911;

O. Awards ZBox compensatory damages in the form of restitution resulting from Tractor Parts' unjust enrichment; and

P. Awards ZBox costs, pre-judgment and post-judgment interest at the maximum allowable rate, fees, and other such further relief as the Court deems just and proper.

Respectfully submitted,

Dated: July 17, 2023

By: /s/ Richard W. Hoffmann  
RICHARD W. HOFFMANN (P42352)  
MATTHEW J. SCHMIDT (P55649)  
Reising Ethington PC  
755 W. Big Beaver Road, Suite 1850  
Troy, Michigan 48084  
Telephone: (248) 689-3500  
E-mail: hoffmann@reising.com  
schmidt@reising.com

*Attorneys for Plaintiff ZBox, LLC*

**JURY TRIAL DEMANDED**

ZBox demands a jury trial on all issues so triable.

Respectfully submitted,

Dated: July 17, 2023

By: /s/ Richard W. Hoffmann  
RICHARD W. HOFFMANN (P42352)  
MATTHEW J. SCHMIDT (P55649)  
Reising Ethington P.C.  
755 W. Big Beaver Road, Suite 1850  
Troy, Michigan 48084  
Telephone: (248) 689-3500  
E-mail: [hoffmann@reising.com](mailto:hoffmann@reising.com)  
[schmidt@reising.com](mailto:schmidt@reising.com)

*Attorneys for Plaintiff ZBox, LLC*